

# **EXHIBIT 1**

# **Declaration of**

# **Daniel Pipes**

**UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF PENNSYLVANIA**

LISA BARBOUNIS	:	CIVIL ACTION
	:	NO. 2:19-cv-05030-JDW
Plaintiff,	:	NO. 2:20-cv-02946
-vs-	:	
THE MIDDLE EAST FORUM, et al.	:	
	:	
Defendants.	:	

**DECLARATION OF DANIEL PIPES IN SUPPORT OF  
DEFENDANTS' MOTION FOR SUMMARY JUDGMENT**

I, Daniel Pipes, make the following declaration in accordance with 28 U.S.C. 1746, and declare under penalty of perjury that the following is true and correct based upon my personal knowledge.

1. I am the President of The Middle East Forum (“the Forum” or “MEF”), the defendant and counterclaim plaintiff in the above-captioned action.
2. The Forum is a research institute founded which I founded in 1994.
3. The mission of the Forum is to promote American interests in the Middle East and to protect Western values from Middle East threats.
4. In the Middle East, the Forum focuses on ways to defeat radical Islam, work for Palestinian acceptance of Israel, develop strategies to contain Iran, and deal with advancing anarchy.
5. In the United States, the Forum emphasizes the danger of lawful Islamism, protects the freedoms of anti-Islamist authors and activists, and works to improve Middle Eastern studies.
6. The work performed by the Forum, at times, generates controversy.

7. As a result, the Forum's employees are occasionally subject to threats by terrorist organizations, including ISIS and Al Qaeda.

8. Confidentiality is of the utmost importance to the Forum, as is responsiveness to donors, as it depends on donations to carry out its mission.

9. Those who work for the Forum have, at times, a demanding and stressful job.

10. Forum staff are frequently required to travel.

11. Defendant Gregg Roman is the director of the Forum.

12. Gregg Roman is very passionate about the Forum's mission and his work.

13. Roman works long hours to advance the Forum's mission across the globe.

14. Roman is a demanding supervisor.

15. He demands the same commitment from the Forum's employees as he does from himself.

16. At times, this has led to personality clashes with his subordinates.

17. Matthew Bennett was the former director of development of the Forum until he voluntarily resigned his position to pursue other opportunities on March 8, 2019.

18. Plaintiff Lisa Barbounis is a former employee of the Forum and the Plaintiff in the instant case.

19. Patricia McNulty is a former employee of the Forum and a friend of Plaintiff.

20. Marnie Meyer is a former employee and human resources director of the Forum who often feuded with Plaintiff.

21. Paul Harris, also known as Tommy Robinson (legal name: Stephen Christopher Yaxley-Lennon) is a United Kingdom-based political activist for whom Plaintiff did substantial work on behalf of the Forum beginning in 2017.

22. Daniel Thomas is an affiliate of Robinson who was in charge of putting together rallies and fundraising for his benefit.

23. Jazmin Bishop (“Bishop”) is the domestic partner and mother of Thomas’ three children.

24. Caitriona Brady is a former employee of the Forum and was subordinate to McNulty and Bennett.

25. Vasili Barbounis is Plaintiff’s husband.

26. Plaintiff began her employment at the Forum in October 2017.

27. Plaintiff was hired as an executive liaison for the Forum and continued in that role until January of 2019, when she was promoted to Director of Communications.

28. From the inception of her employment until November 5, 2018, Plaintiff reported to Roman.

29. As the president of the Forum, I had ultimate supervisory authority over Plaintiff at all times during her employment.

30. I met with new employees, including Plaintiff, and told them that that I maintained an open-door policy and that there should be “no surprises” – in other words, that employees should report any substantive issue concerning their work or their employment to me immediately.

31. I never heard any complaints from Plaintiff about Roman until November 1, 2018.

32. On November 1, 2018, Marnie Meyer sent me several complaints about the behavior of Gregg Roman.

33. The complaints included allegations relating to Plaintiff, Marnie Meyer and Patricia McNulty.

34. I took these complaints seriously and investigated them myself.

35. My investigation included interviewing Plaintiff, Meyer, McNulty and Roman.

36. Plaintiff's complaints largely centered around her issues with Roman's management style.

37. In a meeting held to discuss these concerns on November 5, 2018, the employees' grievances centered around Roman's management style, and as reflected in the meeting notes, no allegations of sexual harassment or misconduct were raised.

38. Roman denied all allegations of sexual harassment and misconduct.

39. I found Roman's denials to be credible.

40. Nevertheless, out of an abundance of caution and respect for the Forum's subordinate employees, I implemented a new supervisory structure which removed McNulty, Meyer and Barbounis from Roman's supervision and implement restrictions on contact with Roman to business hours, with no in-person contact without approval.

41. In follow-up with the aggrieved employees, I relayed these decisions and sought their input as to whether this new structure satisfied their concerns.

42. They all, including Plaintiff, indicated that they were satisfied.

43. Roman agreed to the new structure, and from November 6, 2018 through March 9, 2019, he ran projects for the Forum and met with donors, but was not involved in the day-to-day in-office operations at the Forum and had little to no contact with the Forum's in-office employees, including Plaintiff, nor visited the MEF premises, except one time, supervised by me, in order to clean out his office.

44. Between November 5, 2018 and March 7, 2019, I heard no complaints from any employees concerning sexual harassment, misconduct or retaliation by Roman from any employee.

45. On March 8, 2019, Plaintiff requested that I have Roman return to his previous role at the Forum with some minor restrictions still in place.

46. Plaintiff indicated that, with Matthew Bennett leaving the Forum to pursue other opportunities, she desired Roman to resume his prior duties to give the Forum direction and leadership.

47. On March 9, 2019, I held a staff meeting to discuss Plaintiff's request, and Plaintiff again enthusiastically encouraged Roman's return.

48. On March 13, 2019, I sent a letter to Roman summarizing the new terms of his employment and return to the office, which included a closer collaboration with office staff, but with several restrictions in place, including no authority to hire and fire the Forum's employees, no authority to monitor or restrict communications of staff with me, and no communication with employees outside of normal business hours except at sponsored events or through the use of the company's email or Telegram systems.

49. After March 13, 2019, Plaintiff never complained to me about any sexual harassment, sexual misconduct or retaliation by Roman.

50. In May of 2017, the Forum began working with Tommy Robinson ("Robinson"), to support his free speech rights on controversial subjects.

51. In Spring of 2018, Barbounis began working on the Forum's behalf to support Robinson's free speech rights.

52. Plaintiff's first and primary point of contact for Robinson was a man named Daniel Thomas.

53. At Plaintiff's urging, the Forum provided Thomas with a \$32,000 grant to fund a rally to show support for Robinson

54. Plaintiff was tasked with managing the Forum's relationship with Robinson.

55. At her request, Plaintiff went to London to help with and witness the rally and to supervise the use of the Forum's funds.

56. On August 3, 2018, Plaintiff sent a memorandum to Roman advocating for an increase in the Forum's financial support for Robinson.

57. I had become concerned about The Forum's support for Robinson and indicated that we should limit the Forum's support to his legal issues and refrain from becoming involved in any political support for him.

58. In the fall of 2018, I became concerned that Plaintiff's support for Robinson was causing her to neglect her responsibilities to the Forum and causing potential problems for the Forum.

59. As a 501(c)(3) organization, The Forum cannot and does not involve itself in support for political candidates.

60. Between December 2018 and July 2019, I had numerous exchanges with Plaintiff wherein I repeatedly warned her about her work with Robinson, informed her of the problems that it could cause for her and for the Forum, and cautioned her that her work for the Forum must be her priority.

61. Although Plaintiff indicated at the time that she understood and agreed with my concerns, I have since discovered that she ignored my caution and warnings.

62. Ultimately, after Plaintiff's disregard for my instructions caused her work performance to suffer greatly.

63. Nevertheless, I never disciplined her or terminated her for performance or any other reason, and in fact gave Plaintiff two bonuses in early 2019 for a job well done in addition to her promotion to Director of Communications.

64. In May of 2017, The Guardian wrote an article tying The Forum to Robinson's political campaign because of Plaintiff's work with Robinson.

65. After an exchange with Plaintiff, on June 5, 2019, I wrote to her: "The Guardian article from May 17 has a long, insinuating paragraph about you along with a picture of you. The clear implication is that MEF supports Tommy Robinson's campaign. This rates as both a surprise and an unwelcome complication. The article could entirely disappear but it could also pop up in the future and make trouble for us. I do not want potential trouble hanging over us, so am displeased. You and I have already discussed the matter of your affiliating MEF too closely with Tommy Robinson and we reached an informal agreement that you would stay away from his efforts. Given this development, I am now imposing a formal limitation on you: No campaign work, even during your private time, without clearance from me."

66. On June 17, 2019, I again wrote to Plaintiff: "I am reluctant to tell you where to go and what to do in your private time. But I am adamantly opposed to the press getting wind of your working with Tommy; we have a limited role in his work and your repeated presence there goes much beyond our preferred limits. So, go if you wish but know I will be very upset with major consequences if your presence becomes known outside Tommy Robinson's own circles. Put differently, I much prefer you not go but I leave the decision to you."

67. On August 17, 2019, Plaintiff voluntarily resigned from her position at The Forum.

68. Since Plaintiff filed her lawsuit, through discovery and depositions in this matter, I have learned of disturbing information of which I was unaware during Plaintiff's employment.

69. For example, I learned that Thomas misappropriated the Forum's grant monies, that Plaintiff was aware of his misappropriation, and that Plaintiff never reported that misappropriation to anyone at the Forum, and specifically not to me.

70. Had she done so, The Forum would have made efforts to recover the entirety of the funds provided to Thomas and would have terminated all subsequent funding of Robinson.

71. Had I known about Plaintiff's failure to inform the Forum of Thomas' misappropriation, I would immediately have terminated her employment with the Forum for cause.

72. I also learned that Plaintiff was dishonest with me concerning her prioritization of The Forum's work over her work for Robinson, my instructions to her to limit and ultimately stop any work with Robinson's political campaign, and her loyalty to The Forum.

73. At one point, Plaintiff claimed that she took her children on a personal vacation to Europe, which I later discovered was a lie to cover her activity with Robinson.

74. Had I known about her dishonesty at the time, I would have terminated her employment with The Forum for cause.

75. I also learned that Plaintiff in harassment of Jazmin Bishop, Thomas' wife, and said to Bishop some extremely vulgar and offensive things over the course of several months.

76. By way of example, I learned that Plaintiff told Bishop the following, among other things:

- “You're the biggest fucking loser I've ever met in my entire life. I actually can't think of anybody in the world more pathetic than you right now. Think about what you're doing on your Saturday night.”
- “He dogged you to me in texts you read. He slept with me and came home to you. He posted pics of your kids with our songs. And lied to you the WHOLE time. I'm the one who told your everything and you still think I'm the liar. You are totally insane” and “I am going to galas with the Vice President today. You think I care about two welfare losers [sic]”
- “I'll protect him but don't want him. I have no relationship with you. The only reason I ever showed you anything in the first place was because I was sick of all the lies. But since you refuse to go anywhere there's not benefit in that for me. It's all

a cost benefit analysis. And there is no return on my investment from showing you anything.”

- “That’s why it’s so funny for me you get all angry and call me all these names but deep down it’s all because you know how awesome I am and it scares you. You see me as a threat to your life. And if you didn’t think that I had any power over you or Danny you wouldn’t be messaging me.”
- “Oh, but I do. I really do, because you were so pathetic and sad, you told me all of it. You poor thing. Have another abortion, you whore [laughter].”
- “I went to an Ivy League school twice and I work for Congress, she’s plenty proud. You mom’s a junkie that puts fucking drugs up her snatch. What a loser.”

77. I do not tolerate that kind of behavior or conduct by employees of The Forum, even if carried out on the employee’s personal time.

78. Had I known of Plaintiff’s behavior at the time and if she were still employed by The Forum, I would have terminated her employment with The Forum for cause.

79. I would have terminated her had I known the truth.

80. In short, had I known about (1) Plaintiff’s knowledge of and failure to report Thomas’ misappropriation of The Forum’s grant funds for personal use; (2) her continual disregard of my instructions to limit her work for and association with Robinson; (3) her many misrepresentations to me about the purpose of her trips to the United Kingdom; and (4) her treatment of Bishop in voice mails and text messages; I would have terminated Barbounis with cause for any single one of the above.

81. I have also learned that Plaintiff is in active association with several high-ranking members of far-right white nationalist organizations, such as the Proud Boys, and has indicated support for those people and organizations on social media.

82. The Forum adamantly opposes white nationalism and would not have tolerated such associations were I aware of them at a time when Plaintiff was employed by The Forum.

83. Plaintiff's failure to inform the Forum about Thomas' misappropriation has caused damage to the Forum by, among others things, (1) preventing the Forum from recouping the monies paid to Thomas, (2) continuing to support Robinson financially, (2) continuing to employ Plaintiff and pay her for her work with Robinson, and (4) causing the Forum to incur significant investigative and legal costs.

84. Plaintiff's misrepresentations to the Forum concerning the scope and extent of her work with Robinson and her support of his election campaign has caused damage to the Forum by, among other things, (1) creating the appearance that the Forum was engaged in political activity, which is contrary to its mission, (2) subjecting the Forum to significant negative media coverage, (3) causing the Forum to continue to employ and pay Plaintiff.

85. Plaintiff's conspiracy with Thomas (to cover up his misappropriation) and with Robinson (to continue working for him in a political capacity despite my instructions) caused damage to the Forum for the same reasons as set forth above.

86. I swear under penalty of perjury that the foregoing is true and correct based on my personal knowledge.

Executed March 1, 2021.

/s/ Daniel Pipes  
DANIEL PIPES

# **EXHIBIT 2**

## **Deposition of Lisa Barbounis**

# BARBOUNIS DEPOSITION EXCERPTS

## PART 1

LISA REYNOLDS-BARBOUNIS

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IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF PENNSYLVANIA

LISA BARBOUNIS : CIVIL ACTION NO.  
vs. : 2:19-cv-05030-JDW  
: :  
THE MIDDLE EAST FORUM, :  
and GREGG ROMAN :  
(individually) :

WEDNESDAY, NOVEMBER 4, 2020

VIDEOTAPE DEPOSITION OF LISA  
REYNOLDS-BARBOUNIS, taken pursuant to  
notice, was held by and between all parties  
present via communication technology using  
Zoom, commencing at 11:03 a.m., before  
Kimberly S. Gordon, a Registered  
Professional Reporter, Certified Court  
Reporter and Notary Public.

ELITE LITIGATION SOLUTIONS, LLC  
One Penn Center  
1617 J.F.K. Boulevard, Suite 340  
Philadelphia, Pennsylvania 19103  
[www.elitelsllc.com](http://www.elitelsllc.com) ~ (215) 563-3703

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1 to keep this exhibit up for now?

2 MR. CAVALIER: Yes, for now.

3 BY MR. CAVALIER:

4 Q. Do you have a sexual relationship  
5 with Mr. Baird?

6 A. I do not.

7 Q. Have you ever engaged in sexual  
8 activity with Mr. Baird?

9 A. I have.

10 Q. When?

11 A. 2019.

12 Q. And where did that occur?

13 A. D.C.

14 Q. Was this over a period of time or was  
15 it one discrete incident?

16 MR. CARSON: I'm going to  
17 object.

18 THE WITNESS: Uhm.

19 MR. CARSON: I'm going to  
20 object. We're not going to go into a  
21 history of her sex life today, and  
22 I'm going to direct her not to answer  
23 questions if you try to. I'll allow  
24 this line of questioning to finish,

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1                   THE WITNESS: No, I want to.

2                   MR. CARSON: Lisa, you don't  
3                   have to.

4                   THE WITNESS: I never cheated  
5                   on my husband or had an affair or  
6                   anything. This is what happened, The  
7                   Middle East Forum beat me down. They  
8                   beat me down so bad, so bad. I never  
9                   so much just looked at another man,  
10                   okay, until The Middle East Forum.

11                   And did you know that sexual  
12                   abuse survivors and sexual assault  
13                   victims and sexual people that have  
14                   been attacked by sexual predators,  
15                   like Gregg Roman, one in four have  
16                   extra things like what I do, right.  
17                   It's a classic trauma symptom. So  
18                   don't you go and start blaming my sex  
19                   life on what happened to me.

20                   The only reason that I had sex  
21                   with anybody was because The Middle  
22                   East Forum damaged my freakin'  
23                   emotional state. So please, I don't  
24                   want to go there. This is The Middle

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14 MR. CARSON: So, Jon,  
15 irrespective of what you might have  
16 read in medical records, --

17 MR. CAVALIER: Well, Seth,  
18 irrespective of the records, it's  
19 clearly relevant now.

20 MR. CARSON: It's not a license  
21 to ask her about every guy she's ever  
22 had sex with. It's not a license to  
23 ask her about every guy she's ever  
24 spoken to and then ask her if she's

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1 something.

2 You know, any -- like dismissive,  
3 like I would always try to resort to like  
4 dismissive humor. Because then it was more  
5 like, "Oh, Gregg, come on, you're being  
6 weird", like that, because it was less  
7 hostile and aggressive. Because I was, you  
8 know, afraid that he would, I don't know, do  
9 something. He's weird.

10 Q. So I need you to explain that.

11 Because I've never met the man in person.

12 So --

13 A. Good for you.

14 Q. So tell me what you mean by that.

15 I'm trying to understand what you mean when  
16 you say that he's scary.

17 A. Well, I mean physically he's  
18 intimidating. I mean --

19 Q. Why?

20 A. Just think about it this way, he's so  
21 intimidating that Delaney, a 22-year old  
22 girl, when we were having a meeting, thought  
23 she needed to bring pepper spray. She  
24 brought pepper spray to a business meeting

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1 because she was physically afraid of Gregg  
2 Roman.

3                   Like the man is big, loud,  
4 boisterous. He is -- and he is -- I've seen  
5 him be like real manipulative with employees,  
6 and that started like from Day 1. And I'm  
7 not just talking -- like Eman Patel was a  
8 girl that we worked with, and he told me that  
9 she was a walking lawsuit because she was  
10 gay, Muslim and a woman. And so they were  
11 giving her, purposely giving her work that  
12 she couldn't do because of like constraints  
13 on her identity so that would she would leave  
14 on her own accord. And I saw him do that.  
15 So I was, you know, like, "This guy is  
16 like -- he'll do anything. I don't know what  
17 he'll do. He's nuts".

18           Q. So let me unpack that a little bit  
19 before we take our break. Gregg Roman said  
20 that to you about Eman?

21           A. Yes.

22           Q. What did you say in response?

23           A. I said, "That's not right". And he  
24 goes, "Well, she's also not good. She's on

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1 worked there did everyone become really like  
2 closer and a family and like I get them all  
3 to talk again. Like they had two staffers  
4 had a problem with the Legislative Director,  
5 and now it's gone. Because I encourage  
6 people if you just show people kindness,  
7 sometimes their bark dies down.

8 Q. So, if Gregg was behaving in a way  
9 that you didn't like and you were not telling  
10 him to stop and you were killing him with  
11 kindness, how would he ever know that what he  
12 was doing was wrong?

13 MR. CARSON: Objection.

14 THE WITNESS: Hold on a second.  
15 Because when I would kill him with  
16 kindness and be dismissive, I'm like,  
17 "Gregg, stop. You're gross. It's  
18 inappropriate", like in a dismissive,  
19 funny way. I mean I was still  
20 letting him know.

21 Just because my tone wasn't  
22 like "Gregg, you're the most  
23 disgusting person on the planet"  
24 doesn't mean -- he's not, he's not an

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1                   idiot. Gregg is very smart. He  
2                   knows when he's inappropriate. He's  
3                   an adult. He knows how to act. He  
4                   knows what's right and wrong, I hope  
5                   so, unless he's a complete sociopath,  
6                   which he might be.

7                   I mean you're a human. You  
8                   know when you're doing right and  
9                   wrong, don't you?

10 BY MR. CAVALIER:

11 Q.           But he wouldn't know --

12 A.           Yes, he would. He definitely knew it  
13 was unwelcome, 100 percent.

14 Q.           Well, okay, let's say --

15 A.           Friend zone a guy, right. Like girls  
16 all the time, women talk about all the  
17 time, --

18 Q.           What does "friend zone" mean?

19 A.           -- "Put the guy in a friend zone. He  
20 knows he's in the friend zone". Men are very  
21 aware that they're in the friend zone, "I'm  
22 never getting anywhere with this girl. She's  
23 in the friend zone".

24                   I was trying to make sure Gregg was

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1 super friend-zoned. I talked to him about my  
2 husband, my family, my kids. I invited him  
3 to places, well, in group events only. I  
4 never invited Gregg out one-on-one, never.  
5 Would never do that in a million years. I  
6 tried to kill this dude with kindness and  
7 make sure he knew he was friend-zoned.  
8 Because he was.

9 Q. And what do you mean by  
10 "friend-zoned"?

11 A. It's like the standard urban  
12 dictionary if you want to look it up what  
13 "friend zone" means. "Friend zone" means  
14 you're not going to have sex with that  
15 person. You're in a zone that has no sexual  
16 components to it at all.

17 Q. When you use the term "friend zone",  
18 does it imply that that's a negative place  
19 for a guy to be?

20 A. I mean --

21 MR. CARSON: Objection.

22 THE WITNESS: I guess. I mean  
23 it depends if -- if the guy likes the  
24 girl, I guess it's negative for him.

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1           If the girl -- you know, it depends

2           on like the context I guess.

3 BY MR. CAVALIER:

4       Q.     I'm just trying to understand. I've  
5     been married for 400 years. This is new to  
6     me.

7       A.     You've never heard of "friend-zoned"?

8       Q.     I've heard of it, but I want to know  
9     what it means to you.

10      A.     I just told you. It means that --

11                    MR. CARSON: Objection.

12                    THE WITNESS: -- you can have a  
13     professional or a friendship  
14     relationship with somebody and they  
15     know clear as day that they're in a  
16     friend zone, there's no sex  
17     happening, no kissing, no holding  
18     hands, no physical contact,  
19     inappropriate, all of it. Friend  
20     zone, no sex.

21 BY MR. CAVALIER:

22       Q.     Amongst friends, is it common to  
23     have, even amongst friends in the friend  
24     zone, is it common to have banter about sex

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1 You know what I mean? Like it was forever.

2                   Where do I draw the line between  
3 being drunk and drinking? I don't know,  
4 where like you're like, I don't know, loopy  
5 feeling in your head.

6 Q.       Were there other people drinking --

7 A.       Yes.

8 Q.       -- at the bars?

9 A.       Everybody was, yes.

10 Q.       Was anybody drunk?

11 A.       I don't think anybody was drunk, not  
12 one person. I don't even think Gregg was  
13 drunk.

14 Q.       So you go back to the Airbnb?

15 A.       Uh-huh.

16 Q.       And everybody is just hanging out?

17 A.       Uh-huh. They were talking, they were  
18 talking like to the Pinsker kids, talking  
19 about work and what they do and, you know,  
20 just like BS'g. I forgot, there might have  
21 been other people there too.

22                   I know the Pinsker kids were there.

23 I was so tired. I remember being tired. But  
24 like there was the Pinsker kids were there,

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1 first got there, I think.

2 Q. So you wake up in the morning on the  
3 couch at the Airbnb the next day?

4 A. And I said, "Can we all get out of  
5 here, please", and then we all got in an Uber  
6 I think and went back to our hotel. I don't  
7 really remember, but yes.

8 Q. What happened with the rest of the  
9 trip? Anything of note?

10 A. No. We all went home.

11 Q. Okay. So you get back from AIPAC.  
12 Did you ever confront Gregg about what  
13 happened in D.C.?

14 A. No. Why would I? He's my boss. He  
15 doesn't like what I say, I'm fired.

16 Q. Did you ever tell him that he made  
17 you feel uncomfortable?

18 A. No. That would only, that would only  
19 like make Gregg angry and mean and vengeful.

20 Q. Did you ever tell him that you didn't  
21 like being touched by him?

22 A. No. Who is going to say that to  
23 their boss, "Please don't touch me"?

24 Q. Did you ever tell him that he made

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1 you feel uncomfortable in social situations?

2 A. How could he not tell when I jerked  
3 myself away from him?

4 Q. Did you ever verbalize to him that  
5 you were uncomfortable with him in social  
6 situations?

7 A. No. Should I need to? I mean, like  
8 if somebody punches you in the face, you know  
9 that's inappropriate, do I need to tell them  
10 that that was wrong that they punched me in  
11 the face?

12 Q. Did you ever tell him not to touch  
13 you anymore?

14 A. No. Should I tell people not to tell  
15 me not to -- please don't punch me in my face  
16 anymore? I mean, like you know it's wrong,  
17 right?

18 Q. Did you ever tell Daniel Pipes that  
19 you were uncomfortable with Gregg Roman?

20 A. I hardly ever saw Daniel Pipes.  
21 Daniel Pipes would come into the office maybe  
22 once a month to pick up his mail, he'd sit in  
23 his office, he may come in my office and put  
24 a thing on my desk to fax.

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1                   He was hiding things from Daniel  
2 Pipes, including that he was paying our, half  
3 of our insurance or that he spent \$400,000 on  
4 a website that had nothing happen. I saw him  
5 lie to Daniel Pipes about donors. Telling  
6 Daniel Pipes isn't going to do anything.

7                   Q.     Did you ever go to HR at this point  
8 in time?

9                   A.     Marnie is HR. And I did tell her  
10 when I came back from Israel, well, I  
11 attempted to tell her, but then it got  
12 awkward and then I didn't say anything. But  
13 I told Matt. I felt comfortable enough with  
14 Matt.

15                   Because Marnie and Gregg were like,  
16 were like two little peas in a pod kind of  
17 thing. Like Marnie, when Gregg would do  
18 things wrong, Marnie would like stick up for  
19 him, and like I never understood that, like I  
20 never got it. And that's a lot of the reason  
21 why Marnie and I didn't get along for the  
22 very first part of like the whole first year.  
23 I mean Marnie and I were not like -- we  
24 butted heads all the time, and it was because

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1 on this like Little Project", or whatever,  
2 some sneaky project he was doing, Saudi  
3 thing, I don't know, right, and so -- well, I  
4 do know like some of it but I don't really  
5 recall all the details, but I don't know who  
6 hired him or any of that stuff. All I know  
7 it was called the Little Project and it was  
8 about like influencing people on how to do  
9 it.

10 So he claimed that like he was  
11 bringing me because you weren't supposed to  
12 like do that stuff on American soil and I can  
13 help him with the PowerPoint presentation and  
14 whatever. But then why would you ask Marnie  
15 to go? I didn't think about this until  
16 later. Like why would you ask Marnie to go?  
17 She don't do PowerPoint presentations, right.  
18 Like what do you need somebody to go with you  
19 on that trip for? I didn't think about it.  
20 I said, "I want to go to Israel. I've never  
21 been there".

22 I had never travelled much at all. I  
23 didn't go on my first airplane until I was  
24 25-years old and I went, you know, Vasil-, my

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1 husband took me to Paris. But like, you  
2 know, I'm not well-travelled, and I always  
3 wanted to be. So why not jump on an  
4 opportunity to prove to my boss that I can be  
5 flexible, I can travel, and I can get work  
6 done that he needs and be involved? Of  
7 course I would want to go on that trip.

8 Q. So the first person that he asked to  
9 go on the trip was Matt Bennett, right?

10 A. First that I know he asked was  
11 Marnie.

12 Q. Okay.

13 A. I didn't know about him asking Matt.

14 Q. So, when you heard that this trip was  
15 happening and found out that Marnie did not  
16 want to go, did you go to Gregg and tell him  
17 that you wanted to go? Did you express  
18 interest?

19 A. Yes. Well, he said, "Do you want to  
20 go"? I said, "Hell, yes, I want to go. I  
21 want to go. Let me go".

22 Q. Okay. After what happened at AIPAC,  
23 you weren't concerned about what you just  
24 described to me as all of his creepy

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1 behavior?

2 A. It's creepy behavior. But like I  
3 said, I'm strong, I can handle that stuff,  
4 and normally, I could. I didn't think that  
5 he would be as crazy as he was in Israel. I  
6 never thought that. Because I've never  
7 experienced anything like this.

8 I've never had bosses talk to me like  
9 this. I've never had co-workers treat me  
10 like this. I've never had any of that in my  
11 whole life, and I worked in Congress where  
12 apparently that's supposed to be rampant. I  
13 mean I was an intern down there mingling with  
14 all people. Nobody ever, ever, ever was like  
15 this with me in a work environment, ever.

16 Q. I understand. But at the same time,  
17 I mean you just --

18 A. I just told you I'm strong, didn't I?  
19 Didn't I just tell you that I would do it and  
20 I wanted to go to Israel? Didn't I just tell  
21 you that the reasons that I thought I could  
22 handle myself because I didn't expect Gregg  
23 to be like that? So he looks at me --

24 Q. You did.

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1       A.     So he looks at me creepy here and  
2 there, right. Like okay, well, then let me,  
3 let me, you know, tell him it's not cool and  
4 get work done. Maybe if he sees me as an  
5 equal, he'll start treating me with some  
6 respect. Maybe if I show him what a good job  
7 I do here in Israel and how professional I  
8 can be in front of members of the Knesset,  
9 then he'll have some respect for me.

10           You don't see how anybody would think  
11 that?

12       Q.     Is it fair to say then that what  
13 happened at AIPAC didn't bother you that  
14 much?

15       A.     Oh, it bothered me.

16           MR. CARSON: Objection.

17           THE WITNESS: Wait a minute.  
18           It bothered me, okay, that much at  
19 the time, right. But, you know, I  
20 chalk it up to, okay, maybe he's  
21 drinking, he was smoking pot, maybe  
22 he's high, right.

23           Like it bothered me, very much  
24 it bothered me, very much it bothered

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1                   me. But did I think that it would be  
2                   an ongoing thing? No. Because who  
3                   does that? Who acts like that?

4 BY MR. CAVALIER:

5 Q.           So --

6 A.           And it was an ongoing thing.

7 Q.           So, even though you had this  
8 interaction with him with other people around  
9 that you consider sexual in nature and it  
10 bothered you, --

11 A.           I've never had anybody be like that,  
12 so I don't -- so I did not --

13                   MR. CARSON: Lisa, let him  
14 finish the question.

15                   THE WITNESS: And I was  
16 being -- excuse me. You asked me a  
17 question. I'm finishing.

18 BY MR. CAVALIER:

19 Q.           It's not me interrupting you.

20                   MR. CARSON: No, there's no  
21 question that's asked. So you know  
22 what he's asking you?

23                   THE WITNESS: I'm sorry. Say  
24 that again. Say it all over again.

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1                   Go.

2 BY MR. CAVALIER:

3                   Q.        My question is: You just described  
4 to me a physical interaction with Gregg at  
5 AIPAC that you considered sexual and very  
6 uncomfortable?

7                   A.        Correct.

8                   Q.        That occurred with multiple other  
9 people around?

10                  A.        Correct.

11                  Q.        And it's part of your Complaint in  
12 this case?

13                  A.        Correct.

14                  Q.        But then a month later, you  
15 enthusiastically join him one-on-one on a  
16 trip to a foreign country where you'd be  
17 staying in the same building at least?

18                  A.        Correct.

19                  Q.        And what I'm trying to understand is  
20 how you square those two things.

21                  A.        Because, A, I didn't think that there  
22 would be any drinking involved in the trip.  
23 B, I trusted Gregg that he wouldn't be -- you  
24 know, like I didn't think, I don't, I didn't

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1 think that this would happen again. I  
2 thought this was like a one-time weird Gregg  
3 moment. It wasn't. It turned out it wasn't.  
4 I was being naive.

5 Q. But you also told me that Gregg was  
6 constantly weird?

7 A. He was constantly weird. But men are  
8 constantly weird with me all the time, just  
9 never my bosses. Do you know how many guys  
10 hit on me a week? No offense, like I'm  
11 not -- I'm not saying like I'm this most  
12 beautiful girl in the world, but like men are  
13 constantly looking at me like that. I can --  
14 like I said, I went to the gas station the  
15 other day, the 7-11 the other day. The guy  
16 was like, "Nice dress". I mean people are  
17 always leering at me. Yes, it happens.  
18 Should it happen in your work environment,  
19 should it make you uncomfortable, should it  
20 affect your work product, should it affect  
21 your home life and your mental instability,  
22 no.

23 Most men look at me. So I figured  
24 that he was one of those most men and I would

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1 just deal with it. I didn't think that he  
2 would solicit me for blow jobs, put his foot  
3 up my ass, and like say things that aren't  
4 inappropriate and make me actually nervous  
5 and scared. And no, I didn't think that he  
6 would be out drinking. It's not like it was  
7 a work thing. I didn't -- we weren't  
8 supposed to be entertaining anybody. I  
9 didn't think he'd be drinking.

10           And the first night I chalked it up  
11 to, okay, A, Gregg is creepy all the time; B,  
12 this is an isolated incident because he was  
13 drinking or high or whatever his excuse was.  
14 And like I said, I didn't think he was drunk,  
15 but he was definitely drinking and he was  
16 definitely freakin' smoking pot.

17 Q.       But I don't understand --

18 A.       I didn't think that any of that would  
19 happen now.

20 Q.       So you just said he's creepy all the  
21 time but this was an isolated incident?

22 A.       The physical element of it was an  
23 isolated incident.

24 Q.       Okay.

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1 A. That's what I thought.

2 Q. Okay.

3 A. I thought that that was a one-time  
4 thing that he wouldn't do it again, that it  
5 was an isolated incident. That's what I  
6 thought. I believed that.

7 Because I don't believe that most  
8 people are creepozoids like Gregg Roman.  
9 Because that's not -- like that would be  
10 thinking that everybody is like a terrible  
11 person, and I don't believe that about the  
12 human race.

13 Q. So --

14 A. I didn't actually even believe that  
15 Gregg was. I thought that he was, you know,  
16 weird, sad, ugly and maybe needed attention  
17 because he didn't get it when he was younger,  
18 I don't know. Like I didn't think he was a  
19 bad, horrible human.

20 I thought that he was like okay, he  
21 found me attractive, and when he was drinking  
22 at an event and smoking pot, that he was, you  
23 know, doing whatever he was doing that night  
24 and that I did not expect for that to happen

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1 answered your question. Are you trying not  
2 to be difficult right now or are you  
3 purposely trying to be difficult?

4 Q. I'm just trying to ask a question.

5 A. Because the last time I couldn't  
6 remember.

9 BY MR. CAVALIER:

10 Q. Up until that point, was it in fact a  
11 one-time incident?

12 A. The physical touching up until that  
13 point, yes.

14 Q. So you arrive in Israel.

15 A. And by the way, my mom, because I  
16 told her what happened at AIPAC, told me not  
17 to go to Israel with him.

18 O. Why?

19 A. Because she saw the signs too. I was  
20 the one that was naive.

21 Q. What did your mom say to you about  
22 Israel?

23 A. She said, "Don't go. I don't think  
24 it's a good idea". She didn't trust him.

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1 Mother's intuition, I guess. Does that count  
2 as a thing, that kind of intuition?

3 Q. But you ignored your mother's advice?

4 A. I did ignore my mother's advice.

5 I've done that a lot in my life, to my  
6 chagrin.

7 Q. So you arrive in Israel. What  
8 happens when you land?

9 A. Nothing. It's fine. Everything is  
10 getting ready, like whatever. We get there  
11 and he's like, "Oh, this place only has one  
12 bathroom. I know I promised you your own  
13 bathroom. I didn't know. That's like what  
14 the advertisement said". I was like  
15 "whatever" at that point.

16 Q. Did it bother you?

17 A. We were right in the kitchen.

18 Q. Did it only have one bathroom?

19 A. It only had one bathroom, and he  
20 promised me two.

21 Q. Did that bother you?

22 A. Yes. I don't want to share a  
23 bathroom with him. I don't want to share a  
24 bathroom with any man to tell you the truth.

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1 Like what if I have to use the facilities --

2 Q. So --

3 A. -- in the middle of the hallway?

4 Q. -- did it make you sexually  
5 uncomfortable or was it annoying?

6 A. Well, I had to shower right outside  
7 his room, and I don't like to particularly  
8 put my clothes on wet steamy. I like to take  
9 my towel and like get in my room and then get  
10 dressed, but -- so now I had to like adjust  
11 myself because I didn't want to walk around  
12 in the ho-, in the room in a towel, yes. It  
13 was --

14 Q. It was annoying?

15 A. -- uncomfortable. Of course it was.

16 Q. That's what I'm trying to ask. Did  
17 you make that known that you had a problem  
18 with the arrangement?

19 A. No. I figured I'd deal with it. I'd  
20 just get dressed in the steamy shower.

21 Q. So, when he said to you, "I'm sorry  
22 this place was supposed to have two  
23 bathrooms, it only has one, I know I promised  
24 you your own bathroom", --

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1 MR. CARSON: Object to form.

2 Assuming facts not in evidence. Go  
3 ahead.

4 BY MR. CAVALIER:

5 Q. Could you repeat --

6 A. In a way --

7 Q. Could you repeat to us what Gregg  
8 Roman said about the bathroom situation?

9 A. He just said -- well, originally,  
10 when he said, he's like, "I got us an Airbnb  
11 because it's cheaper". He's like, "You'll  
12 have your own room and your own bathroom".  
13 And I was like, "Sold. I'm in. Fine".

14 Q. Okay. So you get there, there's one  
15 bathroom. What did Gregg say?

16 A. He immediately addressed it, which  
17 made me feel like -- like we just walked in  
18 like the door and there was like this French  
19 guy, he was pretty nice, and the French guy  
20 leaves -- maybe he wasn't French, but he was  
21 speaking French. Whatever. Maybe he was  
22 French, I don't know. Anyway, he leaves, and  
23 then that's like the first thing Gregg said.  
24 It wasn't like he even like toured around the

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1 place. It's like he knew. It's like ugh.

2 Anyway, so that was uncomfortable,  
3 but that -- and -- but that was fine. We  
4 were there for a while.

5 Q. What did --

6 A. And it wasn't until --

7 Q. What did he say to you about the  
8 bathroom?

9 A. He just said, "I'm sorry that there's  
10 one bathroom. I know I promised you that  
11 you'd have your own". And I was like  
12 "whatever". What am I going to say at that  
13 point? We're there.

14 Q. Okay. Okay. So then what happened?

15 A. We went about our business. We went  
16 to the IDF. We went to the Knesset. I  
17 worked on like the Little PowerPoint  
18 presentation.

19 He did tell me not to like put it up  
20 on Facebook or put it anywhere because he  
21 didn't want Daniel Pipes or his wife to know  
22 that I was there. I thought that was weird.  
23 And, accidentally, I slipped and said it to  
24 EJ, and I was like, "Uh, EJ, we're having the

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1 project directors' call. Don't let anybody  
2 know that you know that I'm in Israel because  
3 Gregg doesn't want none of that". And he's  
4 like, "Why does he want to know that"? And I  
5 was like, "I don't know". So I thought that  
6 was weird.

7 Q. When did he tell you that?

8 A. He didn't want Daniel Pipes to know.

9 He didn't want his wife to know.

10 And then like he would have, he would  
11 like FaceTime his wife and his kids and like  
12 make me go in his room, like not in his room,  
13 my room. My husband, I would FaceTime my  
14 husband out in the open, whatever. Like  
15 everybody knows what I'm doing. That was  
16 weird.

17 Q. When did --

18 A. When I was on the project directors'  
19 calls, he wanted me to pretend like I was  
20 still in the United States.

21 Q. When did he tell you that you  
22 couldn't post anything on social media?

23 A. Before we left.

24 Q. Okay. So then you felt that was

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1 weird?

2 A. Yes. I mean like why can't anybody  
3 know that I'm here? What's the problem?

4 Q. Did you think he was trying to pull  
5 something with you?

6 A. I didn't know what it was. I just  
7 thought it was weird. Like I don't sit there  
8 and like analyze every second of everybody's  
9 being, by the way. Like it's not like I'm  
10 sitting there thinking, "Ooh, what does that  
11 mean? What's" -- do you know how like I  
12 would be? My head would be cluttered.

13 I got too much stuff to do. I got  
14 kids and a husband and work and bills. I  
15 mean I got a life here. I can't analyze  
16 every five seconds of a statement that Gregg  
17 Roman makes.

18 Q. Right. But I think it's fair to ask.  
19 I mean you said that he creeped you out  
20 before.

21 A. He does.

22 Q. He creeped you out at AIPAC. Now  
23 he's telling you you can't post on social  
24 media. You find it weird.

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1 A. I did find it weird.

2 Q. Yet you're still getting on a plane  
3 with him by yourself to go to Israel.

4 A. True.

5 MR. CARSON: Objection. You  
6 can answer.

7 THE WITNESS: Clearly, in  
8 hindsight, -- hindsight is 20/20,  
9 isn't that what they say -- poor  
10 judgment on my part.

11 BY MR. CAVALIER:

12 Q. And at the same time, you never told  
13 him, "You're being creepy. Stop"?

14 MR. CARSON: Objection.

15 THE WITNESS: He knew he was  
16 being creepy. Please stop  
17 insinuating like that man did not  
18 know. Please, you're insulting your  
19 own and my intelligence by  
20 insinuating that Gregg didn't  
21 understand what, how his behavior was  
22 making people feel. I mean he would  
23 have to be a total moron to not know  
24 how he was making people feel.

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1 BY MR. CAVALIER:

2 Q. That's not my question. My question  
3 is: Did you ever tell him, "You are making  
4 me uncomfortable?"

5 A. We went over this. How many times  
6 did we go over this? Do you want me to  
7 answer for the 5th millionth time? No.

8 MR. CARSON: Asked and  
9 answered.

10 THE WITNESS: Didn't I answer  
11 that like seven times? No. No.

12 BY MR. CAVALIER:

13 Q. Did you tell him --

14 A. No. No.

15 Q. Did you tell him that it made you  
16 uncomfortable that he was instructing you  
17 that you couldn't post anything on social  
18 media?

19 A. Yes. I said, "That's weird". I did  
20 say that.

21 Q. You told him you thought that was  
22 weird?

23 A. Yes, I did, as a matter of fact.  
24 That I did.

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1 Q. And what did he say?

2 A. I don't remember.

3 Q. Did he say it was for security  
4 reasons?

5 A. It's not for security reasons, and  
6 no, he did not say that.

7 Q. So you said, "This is weird" --

8 A. I think he was, didn't want his wife  
9 to know because she would object to it.  
10 That's what I think. I think he probably has  
11 a history of cheating and his wife wouldn't  
12 like him in a room with a woman. That's  
13 what, that's what I think.

14 Q. Did you tell him that?

15 A. No.

16 Q. You just said, "That's weird"?

17 A. Yes. That's how I talk.

18 Q. You said, "That's weird", and he said  
19 nothing and walked away?

20 A. I don't remember what he said. Do  
21 you not understand that this was two years  
22 ago? I don't remember everything like a -- I  
23 don't -- and I don't have super memory.

24 MR. CARSON: Obj- -- yes.

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1 BY MR. CAVALIER:

2 Q. Well, at the same time, I mean these  
3 seem like pretty significant events in your  
4 life, no?

5 MR. CARSON: Objection.

6 THE WITNESS: Yes, that's why I  
7 remember crystally clear like the  
8 actual events that happened, but like  
9 the minutia surrounding it is not  
10 like that. I mean that's classic.

11 I remember if I have a really,  
12 if I have an argument with my  
13 husband, I can almost remember  
14 everything he says verbatim. Do I  
15 remember the conversation I had with  
16 him yesterday during the day, no, I  
17 don't remember any of that.

18 Like it's minutia compared to  
19 the actual stressful key event.

20 Can we take a break for a  
21 minute?

22 MR. CAVALIER: Of course.

23 MR. CARSON: Yes.

24 MR. CAVALIER: How long you

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1 want?

2 THE WITNESS: Five minutes, not  
3 even.

4 MR. CAVALIER: Five minutes  
5 doesn't work. It never works. Let's  
6 make it ten so that we all get back  
7 at 2:43.

8 THE WITNESS: Fine.

9 MR. CARSON: Yes, I'm going to  
10 walk downstairs and grab a coffee.

11 THE VIDEOGRAPHER: 2:33.

12 - - -

13 (A recess occurred.)

14 - - -

15 THE VIDEOGRAPHER: 2:47 p.m.,  
16 we're back on the record.

17 BY MR. CAVALIER:

18 Q. Okay. So, despite all of the prior  
19 history that you guys had, you still wanted  
20 to go on the Israel trip, yes?

21 A. Yes.

22 Q. So you get there. There's an issue  
23 with the bathroom. What happens then?

24 MR. CARSON: Yes, I'm back.

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1 Not in front of my camera yet, but  
2 I'll be there in a second. You can  
3 start though.

4 THE WITNESS: What happened?

5 We already went over this. I -- what  
6 are you specifically referring to?

7 BY MR. CAVALIER:

8 Q. Did you start working?

9 A. Yes. I think we went first to, we  
10 had an IDF meeting at the --

11 MR. CARSON: Wait. Can you  
12 guys --

13 THE WITNESS: Wait, what?

14 MR. CAVALIER: I can hear you,  
15 Seth.

16 MR. CARSON: All right. It  
17 sounded like you got started before I  
18 got back.

19 THE WITNESS: Oh. Are you  
20 back? I thought you said --

21 MR. CAVALIER: We are starting.  
22 I thought you were back.

23 MR. CARSON: Yes, no, I just  
24 got on, but go ahead. It's okay.

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1 BY MR. CAVALIER:

2 Q. You had a meeting with the IDF?

3 A. He did, yes. And I stayed and  
4 answered e-mails in like a, there was like  
5 this coffee place I ate at, and then he met  
6 me there. I'm trying to think of what --  
7 like I don't know what you want to know here.

8 Q. Okay. So was the first day of work a  
9 normal workday?

10 A. Yes. I think it was until like the  
11 second -- we were there for a while. I think  
12 we were there for like seven days or  
13 something. I forgot how long we were there.

14 Q. Okay.

15 A. It just felt like forever. I  
16 couldn't wait to get home.

17 It was -- Gregg -- I didn't smoke at  
18 the time. Gregg usually chews nicotine gum.  
19 He was -- but he smoked there. And there was  
20 this outside balcony and it was kind of cold  
21 there or whatever, so he was out there  
22 smoking and he was like, "Come out here and  
23 talk to me". So I did. Like I sat. This is  
24 at nighttime. Well, I don't know which day

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1 it was, but it was one of the days. And he  
2 sat -- I sat like -- I don't know, like he  
3 was one side of this like long couch thing  
4 outside.

5 Q. Okay. I don't, I'm sorry, I don't  
6 mean to interrupt you. I'm going to ask you  
7 to pick right back up. But we're assuming  
8 this is like the second night you're in  
9 Israel?

10 A. Like maybe the second or third. It  
11 was like --

12 Q. First, early in the trip?

13 A. Earlier in the trip, right, yes.

14 Q. Okay. Up until that point, did  
15 anything happen about which you would  
16 complain?

17 A. Physically, no.

18 Q. In any way? Verbally?

19 A. I mean the two incidents that  
20 happened there like cloud my memory. Do you  
21 know what I'm saying? Like it was just like  
22 I just -- I hardly remember any of the trip.  
23 I remember those things.

24 Q. That's fair.

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1       A.     Like I remember -- there's certain  
2     things I remember. Like I remember being at  
3     the Knesset. I remember eating lunch there.  
4     I remember going to a different lunch with  
5     the interior Sud guy. I remember going, like  
6     going out by myself. I remember going to --  
7     like not, Gregg not letting me go see the old  
8     city, whatever. Like there's certain --  
9     there's like -- I remember like chunks of it.  
10    Like you know what I mean? I don't know how  
11    to explain it.

12           But that, you know, I don't remember  
13    exactly what day it was, but I remember that  
14    it happened. You know what I mean? I don't  
15    even remember -- I remember we ate. I'm  
16    trying to, if I could try to think right, we  
17    had dinner one night that we got there, and  
18    it was fine. Yes, I don't remember --

19       Q.     Okay.

20       A.     -- anything like that like sticks out  
21    other than these like two crazy things.

22       Q.     Okay. So tell me about the two crazy  
23    things.

24       A.     So the one, like I said, he was out

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1       smoking a cigarette and asked me to come  
2       outside. So I did.

3       Q.     Early in the trip?

4       A.     What?

5       Q.     Early in the trip still, right?

6       A.     Yes. This is the early in the trip  
7       one.

8       Q.     Okay.

9       A.     And he was like -- I sat like further  
10      down. It was like a long couch, and he was  
11      like on one side and I was on the other. So  
12      he's like big though. Like Gregg is tall.  
13      So he was like getting comfortable, he had  
14      the blanket, he's smoking a cigarette and he  
15      like, like moves his body like this, like,  
16      you know, to the whatever side to me, puts  
17      his feet there, and I was sitting like kind  
18      of like, like with my legs up kind of  
19      comfortable, you know. And he slides his  
20      like foot like under my butt and he was like,  
21      "Oh, I guess we reached a new spot in our  
22      relationship. My foot is on your ass". I  
23      was like, "Gregg". And then I moved, like I  
24      went and moved away or whatever, and then we

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1 just continued our conversation. He's like,  
2 you know, "You really need to be like my  
3 right hand. It's going to be like me and  
4 you. Like you're my, you know, you're my  
5 second in command. We're going to make you  
6 all this. Like, you know, you're going to,  
7 you're going to be leading this. We'll make  
8 you like some type of Chief of Staffer. You  
9 can eventually like run the project  
10 directors, you can run the calls, all that  
11 stuff".

12 So that incident I was like "ugh,  
13 what is this dude doing", like I thought  
14 like -- whatever. And like I said, it was  
15 uncomfortable and I didn't like it, but here  
16 I am in Israel. What am I going to do, like  
17 find a flight home and go to a foreign, like  
18 navigate a foreign country where I don't  
19 speak the language and whatever? Like there  
20 were air raid sirens. I was like nervous  
21 there in general. Like we weren't -- he said  
22 the area we stayed in were nice, was nice,  
23 but let me tell you, like it was like one  
24 building was nice and the next one had

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1 graffiti on the wall. Like you know what I  
2 mean? I didn't feel safe there at all. And  
3 Gregg made it feel like it wasn't safe,  
4 "Because I got this because there's extra  
5 security. You can see like the camera  
6 outside, and like, you know, you need" -- he  
7 always kind of like made me fearful in  
8 general for my life.

9           Like the reason I said "hey, can I go  
10 to the old city", right, like when we went to  
11 the Knesset and he was like, "Oh, there's not  
12 going to be any time", blah, blah, blah.  
13 "Well, I'll just go by myself, and I'll meet  
14 you back there". You know what I mean? Like  
15 let me just go look. And he was like, "No".  
16 He was like, "You're a pretty girl and like  
17 something bad will happen to you, and like  
18 I'll be responsible for you like getting  
19 attacked". Like he always made me feel like  
20 if I left his side or wasn't in that room  
21 that something like terrible was going to  
22 happen to me. He just, he was like always  
23 like inciting fear.

24           And so when he put his foot under my

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1 leg, under my butt and stuff, I'm like, "What  
2 am I going to do here? How am I going to get  
3 out of this situation? So I'm just going to  
4 avoid him". So that's what I did for the  
5 most part. I tried to avoid him as much as  
6 possible.

7 Q. Let me back you up a second. You  
8 said that he always made you feel unsafe. I  
9 mean it wasn't the safest --

10 A. While I was there. When I got to  
11 Israel, he made me feel unsafe.

12 Q. But you also told me that it wasn't  
13 that nice a neighborhood, right?

14 A. Yes. He made me feel --

15 MR. CARSON: Objection.

16 THE WITNESS: He made me feel  
17 unsafe like -- it wasn't that nice of  
18 a neighborhood, and he made me feel  
19 unsafe in that like he reinforced  
20 that like -- he said it was a nice  
21 neighborhood, but like you don't know  
22 who is out to get us and you don't  
23 know who is like whatever.

24 Like he made me feel like if I

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1                   wasn't like, I don't know, like  
2                   attached at the hip to him that like  
3                   I -- you know, there was a time where  
4                   like I went out, finally after the --  
5                   it was the night after the real big  
6                   incident with him, the blow jobs and  
7                   all that that like he was like, "I'm  
8                   having somebody over to the house for  
9                   meetings. You can go like walk  
10                  around". I was like, "All right.  
11                  Well, I'm going to go to like that  
12                  little market that was down there  
13                  that looked cool or whatever", and  
14                  that's what I did. And I went to the  
15                  beach and like put my feet in the  
16                  water. And I was like, you know,  
17                  thinking and reflecting. And I tried  
18                  to stay there as long as possible.  
19                  And he's like, "Are you coming back?  
20                  Are you coming back"?  
21                  Like just he -- it was like  
22                  such a bad experience. It was just  
23                  like, you know, like he tried to  
24                  make, Gregg always tried to make,

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1           like always made you, and this is not  
2           just Israel trip, always made you  
3           feel like you needed him, like you  
4           needed him, he's in control, he's the  
5           boss, he's everything, you need him.

6           You know what I mean? And like --  
7           and Israel it was heightened and it  
8           was -- and he made me nervous. And  
9           I'm not like a scared person. I mean  
10          I've lived in rough neighborhoods in  
11          Philly. Like that's not -- I'm not  
12          that kind of person. Like I'm not  
13          afraid, usually. And he just made me  
14          like uncomfortable.

15           And so when he touched me like  
16          with his foot, like I'm thinking  
17          like, "What do I do here? Do I go to  
18          the police? Do I freakin' leave? Do  
19          I go get my own place? Like what do  
20          I do"? And I was like, "I'll just  
21          avoid him". I talked to my husband  
22          and he was like, "Just avoid him.  
23          Just avoid -- just like, you know,  
24          but it doesn't have to be work, just

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1 go sit in your room".

2 And so I tried to be in my room  
3 as much as possible. I even would  
4 say like, I even would like make  
5 stuff up like, "Oh, my husband is" --  
6 it was like weird hours. "Oh, my  
7 husband is calling me. I'm going to  
8 go in my room". You know what I  
9 mean? Like just I like had to avoid  
10 him.

11 Now, I FaceTimed and like did  
12 stuff in front of him, but like that  
13 was also like a signal like I'm with  
14 my family and doing -- you know, I  
15 just, ugh, it was the whole thing was  
16 awful.

17 BY MR. CAVALIER:

18 Q. Given the fact that the neighborhood  
19 wasn't that nice and there are air raid  
20 sirens going off and you're meeting with  
21 certain high-level groups, isn't it possible  
22 that his concern for your safety was just  
23 legitimate concern for your safety?

24 MR. CARSON: Objection.

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1                   THE WITNESS: I mean it's  
2                   possible, but that's not, that's not  
3                   how he made me feel.

4 BY MR. CAVALIER:

5 Q.        Okay. But you don't have any reason  
6 other than your own feeling to believe that  
7 that wasn't his motivation, do you?

8 A.        No.

9                   MR. CARSON: Objection.

10 BY MR. CAVALIER:

11 Q.        All right. So did you say anything  
12 to him when he put his foot underneath you?

13 A.        I said, "Gregg, stop".

14 Q.        Did he stop?

15 A.        Yes.

16 Q.        Okay. Did you tell anybody else that  
17 you encountered on the trip about what had  
18 happened?

19 A.        No. They were his people. I -- they  
20 barely even spoke English, half of them.

21 Q.        You told me that you told your  
22 husband what happened?

23 A.        But you said anybody that was on the  
24 trip I thought you said.

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1 Q. Yes, I did. I'm asking you --

2 A. My husband wasn't on the trip.

3 Q. Right. But you did tell your husband  
4 what happened?

5 A. I did. I told my husband; my mom;  
6 Katherine Urkel, who is the lady that like,  
7 well, my work wife. I told a bunch of  
8 people.

9 Q. Did you ask any of them to try to  
10 arrange for you to get home?

11 A. No. I mean my husband just said,  
12 "Just avoid him", so that's what I did.

13 Q. Okay. And so --

14 A. And my mom goes, "I told you that was  
15 going to happen".

16 Q. Right.

17 A. "Yes, mom, I'm an idiot".

18 Q. Right. But you thought avoiding him  
19 was --

20 A. Sufficient.

21 Q. -- a practical, a sufficient  
22 resolution to the issue?

23 A. At the time, yes. In hindsight, I  
24 was naive.

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1 Q. Okay. So you're avoiding him, and  
2 otherwise, work goes on as normal on the  
3 trip?

4 A. Yes, until he went out that night.

5 Q. What night?

6 A. The night before we left.

7 Q. Okay. So we're now a couple days  
8 after the foot incident --

9 A. Uh-huh.

10 Q. -- on the eve of you going back, of  
11 everybody going back home, both of you going  
12 back home?

13 A. He had a meeting the next day, and  
14 then I think we were flying out -- it was  
15 like the night or two before we left.  
16 Because the next day he had those meetings  
17 that I wasn't a part of and then I walked  
18 around, and I think that was my last day  
19 there. And I don't remember if we flew out  
20 in the night or first thing in the morning.  
21 I can't remember when we flew out.

22 Q. Okay. In between the foot incident  
23 and the second incident, did anything of a  
24 sexually offensive nature occur?

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1 A. No.

2 Q. Tell me about the second incident.

3 A. So Gregg goes out and he says he's  
4 got a meeting, and I'm wondering why I can't  
5 go because I had been going to most of them.  
6 And he goes out to a meeting and he comes  
7 back and he's clearly drunk, and I was  
8 working on this PowerPoint presentation.  
9 He's clearly drunk, and I'm sitting on the  
10 couch. And there's two couches. I was on  
11 the left-hand side one.

12 And he's like stomping around and  
13 talking to me about how he -- he comes in and  
14 he was like, "Ugh". He's like, "Did you know  
15 that I had sex with Lea Merville"? And I was  
16 like, "Excuse me. What? Lea"? And I -- and  
17 I heard whispers of that from like Matt, but  
18 I didn't really believe him because I didn't  
19 think Lea Merville would ever sleep with  
20 Gregg Roman. And so he said -- but I didn't  
21 hear any details from Matt. Like I just  
22 heard that it happened.

23 And so then I was like, I don't know,  
24 like, "Whatever. Like I don't want to hear

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1 about you sleeping with Lea Merville". He  
2 was like, "Well", --

3 Q. Did you say that to him?

4 A. What?

5 Q. Did you say that to him?

6 A. No. I was just like, "I didn't know  
7 that".

8 Q. Okay.

9 A. No. Like I said, I was trying to  
10 like avoid him. Like I didn't want to get  
11 into a conversation with him, so I'm not  
12 going to like talk to him. Do you know what  
13 I mean? That wasn't my intention to like  
14 engage more in conversation. I was like,  
15 "No, I didn't know that".

16 But, anyway, he told me that Lea, he  
17 was like, "Did you know she was a dancer?  
18 She's got a rocking body. I fucked her".  
19 And I was like -- and then I said, I asked  
20 him, "When", right, because like I -- she was  
21 our intern there. And he was like, "When we  
22 were in Israel, we met up at an event and she  
23 needed her paperwork signed like to certify  
24 her internship at MEF". She was no longer an

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1 intern but she needed this paper for her  
2 class credit or whatever. And he told me  
3 that, he said that the paperwork was up in  
4 his room and she went up there and one thing  
5 led to another and she gave him a blow job,  
6 she was on top, I got the whole thing, about  
7 her dancer body, and just gross and  
8 inappropriate, you know.

9                   And he was like -- and then he  
10 started like trying to justify like why he  
11 was cheating on his wife and that it's hard  
12 having three kids and being a director and  
13 that it's a lot of pressure and all that kind  
14 of stuff. And that's when he was like, you  
15 know, "Sometimes I just need a release.  
16 Sometimes I just need a release. Like why  
17 can't I just have a good blow job. I tried  
18 to meet up with Lea and she said no". And I  
19 was like (witness made a sound).

20                   So, anyway, he was drunk and he was  
21 running around, and I wasn't engaging in that  
22 at all, right.

23                   Q.     Did you say --

24                   A.     That was the extent of my engagement

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1 in him. So I guess --

2 Q. You said nothing to him in response  
3 to what he was saying?

4 A. I mean I was just like, "I didn't  
5 know that. I can't believe that you slept  
6 with Lea. She's young". You know what I  
7 mean?

8 Q. Okay.

9 A. It was just weird to me. So he  
10 leaves I guess because I'm not engaging in  
11 the conversation or whatever. He's like,  
12 "I've got another event. I'm going out",  
13 blah, blah, blah, blah, blah.

14 Then he comes back the second time  
15 and says that he tried to meet up with his  
16 ex-girlfriend and she denied him too. And he  
17 was like, "I don't know what it takes to just  
18 get laid around here. Like I want a blow  
19 job. I just need a release". "Lis", -- what  
20 was he, what did he say? He said, "Lis", he  
21 was like, "can't you just give me a release"?  
22 And I was like, "Gregg, no. Stop it. You're  
23 being creepy", right.

24 And then I was texting my husband, I

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1 was like, "Gregg is being creepy. FaceTime  
2 me, whatever", and he -- my husband was like  
3 laughing like thinking it was funny. Like I  
4 don't think that he understood at the time  
5 the severity of like how uncomfortable I was.

6 So then I started texting Tricia, and  
7 I like went in my room and I started texting  
8 Tricia and I was like, "Dude, Gregg is being  
9 disgusting". And she was like, "What, like  
10 AIPAC couch". And I was like, "No". Because  
11 he was worse than that. Like he was, you  
12 know, like asking me and talking about sexual  
13 conquests. He used the word "conquests", and  
14 I remember that. I remember him just being  
15 so crazy.

16 So I got a knife. I said to her,  
17 "I'm going to get a knife and put it under my  
18 bed". Because, A, my door didn't lock it.  
19 So the way my room was set up it was a big,  
20 glass like wall maybe that had curtains, and  
21 my door barely even shut all the way. It  
22 like didn't lock. And so I was like, "I'm  
23 going to put a knife under my bed and sleep  
24 with it". Because he's big. Like I think

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1 I'm strong and I'm tough, but I can't fight  
2 6'5", 300-pound Gregg, like I can't do it.  
3 So I slept with a knife under my bed, and I  
4 said that to her. And I came home and I told  
5 her, I told my mom, I detailed it in text to  
6 Katherine Urkel. Like I told people. It was  
7 awful. It was awful.

8 And then when he said I didn't have  
9 to go to the meeting the next day, I was so  
10 relieved, I just wanted to get out of there.  
11 I was gone as long as possible. I stayed  
12 away as long as possible, and I just could  
13 not wait to get home.

14 Q. Did you tell Gregg that he made you  
15 so uncomfortable that you slept with a knife  
16 in your bed?

17 A. No. Why would I tell him that? I'm  
18 afraid of him.

19 Q. I mean --

20 A. Especially at that point, he was  
21 drunk, out of control. He was saying crazy  
22 things.

23 Q. The next day --

24 A. I didn't know how he was going to be

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1 that day --

2 Q. The next day on the plane ride home?

3 A. So I can just go missing there and  
4 nobody would know, right, like because I'm in  
5 this scary land and in this scary --

6 Q. Okay.

7 A. -- neighborhood and it's a scary  
8 time, and I'm a pretty, tall, white girl  
9 according to him.

10 Q. At the airport --

11 A. What?

12 Q. At the airport or on the flight home  
13 or when you got back to Philadelphia, did you  
14 ever tell him like, "Hey, you made me so  
15 uncomfortable in Israel I slept with a knife  
16 in my bed"?

17 A. Do you think I wanted --

18 MR. CARSON: Objection.

19 THE WITNESS: -- to lose my  
20 job?

21 BY MR. CAVALIER:

22 Q. It's your belief that you would have  
23 been fired for telling your boss he was  
24 making you uncomfortable?

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1 to like a third party. So -- and I was like,  
2 "Really? After the way he acted in Israel,  
3 that's how -- that's -- like he's going to  
4 complain about this the way he treated me".  
5 And she goes, "What are you talking about"?  
6 And I was like, "Nothing, never mind".  
7 Because I -- and she tried to pull it out of  
8 me. She was like, "What happened in Israel"?  
9 And I was like, "I'm not getting into this".

10                   And I told Matt, and I told Tricia.  
11 And Matt was like, "Well, we should do  
12 something. We should go to Daniel. We  
13 should do something". And I was like, "I  
14 don't want to get involved. Like I don't  
15 want to lose my job. I'm like not interested  
16 in this. It would be bad for my reputation  
17 as like a conservative pers-, like Me Too  
18 person". And we had lengthy, lengthy  
19 conversations. I would sit in Matt's, on  
20 Matt's floor in his office and complain to  
21 him and tell him everything.

22 Q.        Okay.

23 A.        Matt knew everything.

24 Q.        So --

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1 think I might have e-mailed it to Danny or  
2 something like that, but I never even read  
3 it.

4 Q. Okay. Do you know if it detailed  
5 what the monies were to be used for by  
6 Thomas?

7 A. I don't know if the grant agreement  
8 said that. However, when we were in  
9 communication with Danny, I had asked him via  
10 e-mail like, you know, "Give me a breakdown  
11 of what everything will cost and get me, you  
12 know, like the information", and he gave me  
13 all of that, it had a number on it, it went  
14 to Gregg, Gregg approved it, end of story.

15 Q. Do you know how much money went from  
16 MEF to Thomas?

17 A. I feel like it was 30,000. It might  
18 have been, it might have been 20. I don't  
19 remember exactly.

20 Q. Does 32,000 sound right?

21 A. It sounds about right. I think  
22 because when -- I think that why I'm thinking  
23 20 is because pounds versus dollars.

24 Q. When was the first time you went to

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1 London in connection with Tommy Robinson?

2 A. I went for that demonstration I think  
3 it was June, the demonstration that was on  
4 June 9th I believe. I'm not exact, --

5 MR. CARSON: Object.

6 THE WITNESS: -- but June.

7 MR. CARSON: I just wanted to  
8 put an objection on the record with  
9 the characterization of "in  
10 connection with Tommy Robinson", but  
11 go ahead.

12 THE WITNESS: Okay.

13 BY MR. CAVALIER:

14 Q. And your answer to that question was  
15 June of 2018?

16 A. I believe so, yes.

17 Q. Okay. Did you meet Danny Thomas  
18 during that trip?

19 A. Briefly. I met him for all of  
20 30 seconds.

21 Q. What did you talk about?

22 A. Nothing. I said hi, he thanked me, I  
23 thanked him for, you know, pulling it off,  
24 and that was it.

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1 mingling for the most part.

2 Q. Okay. So the dinner ends cordially.

3 Do you see Thomas later?

4 A. We all share a taxicab home. We  
5 tried to get an Uber, there weren't any, and  
6 then they finally had to call a cab. We had  
7 to call a cab.

8 Then there was no -- like the guy  
9 wouldn't take our credit card. Then I had to  
10 like run around in like subway stations and  
11 like try to find an ATM to get cash out to  
12 pay the guy, but that just left me and my  
13 mom. We dropped Danny and Avi off at their  
14 places, Cassandra too, and then me and my mom  
15 went back to our hotel.

16 Q. Did you go back out later?

17 A. No.

18 Q. You didn't see Thomas later that  
19 night?

20 A. Nope.

21 Q. Did you have drinks with Thomas and  
22 others after the dinner?

23 A. Not after the dinner, no.

24 Q. At any point during the day?

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1 A. Not that day.

2 Q. At any point the next day?

3 A. Yes. The next day was the  
4 demonstration and Tommy got a good verdict  
5 and we all went out to celebrate afterwards,  
6 and my mom went back to her hotel room and it  
7 was like all of us celebrating. We went to a  
8 pub, Red Lion I want to say it is or  
9 something like that, right near Whitehall.  
10 It was right around the corner from my hotel  
11 room with my mom, my hotel with my mom.

12 Q. Okay. And was your mother present at  
13 that point in time?

14 A. She was not. She showed up. She  
15 like -- she was a little tired because it was  
16 cold that day, so she went back to the hotel.  
17 And then we were still out, and then she came  
18 and met us out and came back out and then she  
19 went home. And then there was like a fight  
20 about to break out or something like that,  
21 and me, Danny and Tommy like went a different  
22 direction. Because there was something  
23 happening crazy. I forgot what it was.  
24 Somebody started -- I think actually it was

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1 A. Probably said it jokingly in anger  
2 maybe. I don't know. I don't remember  
3 saying that, but I -- maybe.

4 Q. Is that the kind of thing you would  
5 typically --

6 A. Get under her skin.

7 Q. Is that the kind of thing you would  
8 typically say as a joke?

9 A. I would never actually sleep with  
10 Danny Tommo again. Like that would be gross.  
11 I don't know, I also said the things I said  
12 about abortion.

13 Q. What makes it gross now?

14 A. What makes it gross now? He punched  
15 me in my face and chipped my tooth.

16 Q. Okay.

17 A. That's what makes it gross now.

18 Q. So let's talk a little bit about that  
19 briefly. Where did that occur?

20 A. Brussels.

21 Q. Why did you go to Brussels?

22 A. I went to Brussels because Janice  
23 Atkinson asked me to speak at a, to the  
24 European Parliament, and I was planning to

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1 until she told me that Alex Jones was going  
2 to speak and then I pulled out. And then she  
3 told me Alex Jones wasn't going to go and  
4 then I still had reservations about it, but I  
5 still went to watch the event.

6 They were paying for my hotel room,  
7 not The Middle East Forum, Janice Atkinson  
8 did, and I paid for my own flights and my own  
9 everything out there. So it was a personal  
10 trip.

11 Q. Okay. And so Tommy Robinson joined  
12 you in Brussels?

13 A. No. He was originally invited to  
14 speak and then he was dis-invited to speak  
15 because they thought that they wouldn't let  
16 him in the Parliament or something like that,  
17 but he was flatboard (ph) --

18 Q. So Tommy Robinson wasn't really a  
19 part of that trip then?

20 A. No.

21 Q. But Danny Thomas was?

22 A. I asked him to come join me.

23 Q. Okay. And did he do so?

24 A. Uh-huh.

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1 Q. Why did you ask him to join you?

2 A. Because I was seeing him then.

3 Q. Okay. Did you pay for him to make  
4 the trip?

5 A. I don't remember. I might have paid  
6 for his train or something like that. I  
7 don't know. Maybe.

8 Q. Did you meet a woman named Amy  
9 Mekelburg while you were in Brussels?

10 A. I did.

11 Q. Who is that?

12 A. She's a friend of mine.

13 Q. What does she do for a living?

14 A. She helps people with wrongful  
15 convictions, and she has a website called  
16 RAIR that highlights, that highlights the  
17 intersectionality of Communism and Islamism.

18 Q. Have you ever done any work for her  
19 organization?

20 A. I proofread her stuff and, you know,  
21 like things you do for a friend.

22 Q. Have you ever tried to raise money  
23 for her organization?

24 A. She at one time -- so she is friends,

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1       she was already friends with David Horowitz  
2       and Adam Milstein. They're friends that  
3       she's had for like quite a long time. They  
4       follow her on Twitter and they have, and  
5       they've had regular communications.

6               But they always asked her to submit  
7       like actual, you know, proposals, and she  
8       didn't know how to write them up. So I was  
9       trying to help her, you know, to do that.

10       Q.       Did you ever try to solicit money  
11       from MEF for her organization?

12       A.       She asked me to submit a proposal to  
13       Daniel Pipes, I helped her with it, and he  
14       lambasted it. He said it was juvenile I  
15       believe were his words. Sophomoric.

16       Q.       Do you ever --

17       A.       It might have been "sophomoric". I  
18       can't remember.

19       Q.       Did you ever provide Amy Mekelburg or  
20       her organization with an MEF donor list?

21       A.       No.

22       Q.       Did you send her an MEF document,  
23       confidential document marked, a fund-raising  
24       document marked Confidential?

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1 A. Apparently I did.

2 Q. I'm asking you.

3 A. No.

4 MR. CARSON: Objection.

5 THE WITNESS: At the time that  
6 I sent it, A, I didn't know it was a  
7 confidential document. I wasn't  
8 paying attention. I was just trying  
9 to like -- I just pulled one and  
10 said, "Look, this is how you write a  
11 proposal".

12 BY MR. CAVALIER:

13 Q. Okay. So you --

14 A. At the time, I wasn't aware it was  
15 confidential.

16 MR. CARSON: This is not the  
17 trade secret case. The scope of your  
18 examination, if it's going to go to  
19 the trade secret case, I did not  
20 prepare my client, and she did not  
21 prepare today for testimony on that  
22 case. So, you know, --

23 MR. CAVALIER: Well, two  
24 things.

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1                   MR. CARSON: I don't think it's  
2                   proper to question her knowing that  
3                   there's another case to try to go  
4                   after her in connection with that  
5                   case when we're here today to talk  
6                   about another case.

7                   MR. CAVALIER: So, if that's  
8                   the extent of your objection, I'll  
9                   respond by saying she acknowledged at  
10                   the beginning of this deposition that  
11                   she didn't prepare at all, so I don't  
12                   think that's very valid, and  
13                   secondly, I mean anything that may  
14                   even lead me to evidence is  
15                   permissible in this deposition. But,  
16                   nevertheless, I won't belabor the  
17                   point.

18 BY MR. CAVALIER:

19                   Q. My point is, my question is this: Do  
20                   you recall sending Amy Mekelburg a document  
21                   called Foundations List?

22                   A. I made that. That wasn't an MEF  
23                   document. I made that from the websites.

24                   Q. When did you make it?

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1       A.     I don't remember. I was trying to  
2     help her with the thing, and it's -- all the  
3     information that I gave her was public access  
4     information. I gave her -- I even put like  
5     website links so she could check out the  
6     foundations on it. It wasn't an MEF  
7     document.

8       Q.     Is the amount of money that was on  
9     that document from MEF donors public  
10    information?

11      A.     Yes. Everything that is over I think  
12     500, \$5,000, whatever, it has to be listed on  
13     your 990.

14      Q.     So were there donations on that  
15     document that were in excess of \$5,000?

16      A.     They were only in the excess of  
17     \$5,000. All public information.

18      Q.     Did the document include reference to  
19     e-mails that were in the public domain?

20      A.     I believe so.

21      Q.     Did it include reference to e-mails  
22     that were not in the public domain?

23      A.     I don't think so.

24      Q.     Where did you get the information

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1 that went into the document?

2 A. On the websites.

3 Q. What websites?

4 A. The foundations' websites.

5 Q. What foundations?

6 A. I don't remember what they were off  
7 the top of my head.

8 Q. The foundations that provided the  
9 money or the MEF website?

10 A. What?

11 Q. I'm trying to figure out --

12 A. The foundations that had the money.

13 Q. Okay. Did you include any  
14 information on that document that were not  
15 from those websites?

16 A. I don't believe so.

17 Q. During the trip to Brussels in 2018,  
18 did you tell Danny Thomas that or did Danny  
19 Thomas tell you that he was ending your  
20 relationship?

21 A. No.

22 Q. He didn't tell you that he was ending  
23 the sexual relationship that you guys were  
24 carrying on?

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1 MR. CARSON: Objection.

2 THE WITNESS: No. Actually,

3 not even a little bit, no.

4 BY MR. CAVALIER:

5 Q. Okay.

6 A. As a matter of fact, Danny --

7 MR. CARSON: Again, --

8 THE WITNESS: Hold on.

9 MR. CARSON: -- referencing a  
10 document that was paid for or that  
11 someone offered to pay for, Jon.

12 THE WITNESS: But additionally,  
13 just so that you know, when I was in  
14 England in, for the Tommy Robinson  
15 MEP campaign, Danny tried to sleep  
16 with me then too and he tried to date  
17 me then too, and I told him "no".

18 So no, Danny Thomas did not --  
19 as a matter of fact, there were text  
20 messages from Danny where I tried to  
21 end it, and he goes, "I ain't going  
22 nowhere". He wasn't, he wasn't ever  
23 trying to leave me.

24 BY MR. CAVALIER:

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1 Q. So you told me he gave you a black  
2 eye and chipped your tooth. How did that  
3 happen?

4 A. We were having sex. He was drunk.  
5 We were having sex. I tried to push him off  
6 me. He was smacking me. He didn't -- I  
7 don't think he punched me. It was like his  
8 hand, he was smacking me. I tried to push  
9 him off. I said, "Danny, it hurts. It's too  
10 hard".

11 I had a cornea problem. I had an  
12 x-ray. I crawled to the ER by myself. He  
13 got drunk and passed out. He didn't even --  
14 I was in there for like nine hours. He  
15 didn't even come until the next day until I  
16 woke him up and begged him to come get me  
17 because I couldn't see.

18 And then he took care, like  
19 technically took care of me like for the next  
20 couple days because I couldn't see. Like he  
21 helped me wash my hair and like did those  
22 type of things because he blacked my eye and  
23 chipped my tooth.

24 Q. How did you feel about that?

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1 MR. CARSON: Objection.

2 THE WITNESS: I think that I  
3 rationalized it in my head as like he  
4 was drunk and he didn't really  
5 understand how hard he was hitting  
6 me.

7 And then it wasn't really I  
8 guess until later when Jazmine sent  
9 me all the pictures of how beat up  
10 she had been by him that I realized  
11 that like this is a common occurrence  
12 for him, and that really made me sick  
13 to my stomach.

14 BY MR. CAVALIER:

15 Q. So you took yourself to the hospital?

16 A. I did. Well, I felt the way down the  
17 hallway and went down to the hotel lobby and  
18 I said, "I need an ambulance", and they put  
19 me in an ambulance.

20 Q. They called an ambulance for you?

21 A. They did.

22 Q. Did you ever report that to anybody  
23 in authority?

24 A. No. No. It's a very embarrassing

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1       thing. I didn't even tell my mom about it  
2       until the other day.

3       Q.       Did you consider it an assault?

4       A.       I, like I said, at the time, I  
5       considered it to be accidental. He was  
6       drinking and didn't realize his strength is  
7       what I took it to be at the time, and maybe  
8       that's why I wasn't as angry about it as I  
9       should have been at the time.

10       Q.       Do you ever remember telling Tricia  
11       McNulty that in a weird way you may be happy  
12       that he punched you because he then took care  
13       of you afterwards?

14       A.       He did take care of me after.

15                    MR. CARSON: Objection.

16                    THE WITNESS: I might have said  
17                    that. Because I was in a really bad  
18                    mental spot.

19                    I mean think about that  
20                    statement that you're just making.

21                    Think about that.

22        BY MR. CAVALIER:

23        Q.       I can understand that.

24        A.       I was certainly not myself.

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1 MR. CARSON: No question.

2 BY MR. CAVALIER:

3 Q. Was the rough sex aspect of your  
4 relationship typical?

5 A. No.

6 MR. CARSON: Objection.

7 Objection. I'm instructing her not  
8 to answer.

9 BY MR. CAVALIER:

10 Q. Where did you stay when you got out  
11 of the hospital?

12 A. My hotel room.

13 Q. And is that where Thomas was taking  
14 care of you?

15 A. Yes. And then I got -- and it was  
16 only like a day or two after, I think it was  
17 a day after, maybe a day and-a-half, and then  
18 I went on a train to Amsterdam with my friend  
19 who met me there.

20 Q. Okay. And how long were you in  
21 Amsterdam for?

22 A. A couple days.

23 Q. It's obviously a popular thing to do  
24 in Amsterdam, so I'll ask the question. Did

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1 you smoke pot while you were in Amsterdam?

2 MR. CARSON: Objection. You  
3 don't have to answer.

4 THE WITNESS: I don't have to  
5 answer that?

6 MR. CARSON: You can I guess.  
7 I think it's a question designed to  
8 harass, embarrass and intimidate, but  
9 whatever. It doesn't matter.

10 THE WITNESS: I mean I have no  
11 problem answering that because I told  
12 the guy -- I'll tell you the truth.  
13 I'll tell you that now. I tell the  
14 truth all the time. Pot makes me  
15 paranoid. It's something that I  
16 don't like, it's something that I  
17 don't like to do, right, and so --  
18 and they always say that in Amsterdam  
19 they have pot that has a strain that  
20 won't make you paranoid, right.

21 So I tried it in Amsterdam and  
22 it still made me freakin' paranoid.

23 It was awful. It was the worst thing  
24 ever. And I was like, "They lied.

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1           They don't even have a strand of pot  
2           that makes you not paranoid like they  
3           said they would, and Amsterdam is  
4           supposed to have everything".

5           So I did. I tried. I took two  
6           hits off the thing. I thought I was  
7           going to lose my mind. I was so  
8           paranoid that everybody was there  
9           laughing at me. I thought -- I  
10           dropped a French fry and I thought  
11           the whole place was staring at me.  
12           It was like the most awful,  
13           uncomfortable feeling in the entire  
14           world. That's it.

15 BY MR. CAVALIER:

16 Q.       Did Danny Thomas accompany you to  
17       Amsterdam?

18 A.       No. No.

19 Q.       Who were you with?

20 A.       What?

21 Q.       Who were you with again?

22 A.       Allison.

23 Q.       Who is Allison?

24 A.       Teddy. Her name is Ingrid Allison

# BARBOUNIS DEPOSITION EXCERPTS

## PART 2

1 IN THE UNITED STATES DISTRICT FOR THE EASTERN  
2 DISTRICT OF PENNSYLVANIA

5 LISA BARBOUNIS,

6 Plaintiff ) 2:19-cv-05030-JDW

7 vs. )

8 MEF, et al., )

9 Defendant )

11 --oo--

13 DEPONENT: LISA BARBOUNIS

14 TAKEN BY: Defendant

15 DATE/TIME: Tuesday, February 9, 2021

17 PLACE: Zoom Videoconference

18 REPORTER: Joyce A. Wise, RMR  
Notary Public

20 APPEARANCES:

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1 superiors?

2 A. I didn't consider them my equals.

3 Q. Did you consider them your  
4 superiors?

5 A. Yes.

6 Q. Okay. Was Marnie Meyer considered  
7 a project director?

8 A. Oh, no. She was Human Resources  
9 and Chief Financial Officer.

10 Q. Okay. And was she Director of  
11 Human Resources?

12 A. Correct, yes.

13 Q. So even though Human Resources  
14 isn't a project, so to speak, she was still, at  
15 least in your view, co-equal to the other project  
16 directors in the hierarchy?

17 A. Correct. And she was above me.  
18 That's very much accurate, yeah.

19 Q. Okay. Okay. Did you ever have  
20 anyone reporting to you during your time at the  
21 Middle East Forum?

22 A. Not until later. And reporting is  
23 like -- yeah. So Delany Yoncheck, Marnie and I  
24 had, like, split her for some time. Like, you

1 know, Marnie would get her for some financial  
2 things. And I would -- she would do some  
3 communicationy things and website, like, tasks  
4 for us.

5 And so, yeah, she reported to me  
6 so that, like, she didn't have to interact with  
7 Greg. But I wasn't technically her boss. Was  
8 just who was, like, somebody who was giving her  
9 guidance and using her, you know, -- using her  
10 work product to further whatever we were doing.  
11 Whatever directive, like, Greg needed.

12 Greg would be, like, tell Delaney  
13 to do this and so I would tell Delaney to do  
14 that. I'm like the middleman.

15 Q. Okay. So help me understand a  
16 little bit more about that relationship.

17 You said you weren't like her  
18 boss.

19 I mean, were you her superior  
20 within the organization?

21 A. I guess I was -- yeah, like, if  
22 you look at things like seniority, I guess I'm  
23 higher than her.

24 Q. And you could give her tasks to

1                   A.        No, it was more than that.

2        Like -- it was more than that.

3                   He was able to give directives and  
4        if those directives were not followed through or  
5        people complained about those directives or  
6        anything like that, it would not be Greg that was  
7        in trouble for us. It would always be us getting  
8        in trouble, because Greg gave us directives, even  
9        though he wasn't supposed to be supervising us.

10                  Q.        Was he giving them to you  
11        directly?

12                  A.        Yes.

13                  Q.        How?

14                  A.        On the project directors' calls,  
15        over e-mail.

16                  Q.        Did you consider yourself to be  
17        reporting to Greg during this time?

18                  A.        I mean, for all intents and  
19        purposes, Daniel -- like, there was plenty of  
20        times where I started reporting to Daniel Pipes  
21        for sure.

22                  But I was still actually actively  
23        reporting to Greg Roman as well. I mean, he  
24        would say, Lisa, what's going on with the radio

1 show and blah, blah, blah. And like give me  
2 directives.

3 Or, Lisa, I need to you do this.  
4 Or, Lisa, how come the IW articles aren't going  
5 out. Whatever.

6 And it turns out, he was trying to  
7 trap me in that. And he gave a directive three  
8 months before that they weren't to go out.

9 So, yes, he was still very much  
10 actively involved and actively supervising.

11 Q. Did you have a problem with that?

12 A. Yes.

13 Q. Why?

14 A. Because -- because Greg would, you  
15 know, continue his -- the same harassing, awful  
16 behavior.

17 Like I just gave you an example.  
18 He was completely retaliatory and disgusting.  
19 And even then, like, I had to go to a radio show  
20 with him, right?

21 And he called us all usurpers. Or  
22 used the usurper thing, gave like this eye. And  
23 then he would still look me and be gross with me  
24 whenever I did see him. He's gross. He's a

1 terrible human.

2 And he continued to harass -- he  
3 tried to get me fired on things. He would say,  
4 Daniel Pipes, this isn't happening, blah, blah,  
5 blah.

6 And then like on a -- we would  
7 discuss one.

8 Here's the example. We would  
9 discuss something on the project directors' call,  
10 one of them was why the IW articles or  
11 newsletters or something weren't going out. I  
12 don't remember what the specific thing was. But  
13 it was with IW.

14 And so I said -- and so Greg's,  
15 like, yeah, it's fine, blah, blah, blah.  
16 We'll make whatever decision.

17 And then Daniel Pipes was not on  
18 that phone call. And I had been on the phone  
19 with Sam right afterwards, who runs IW.

20 And so then I get an e-mail from  
21 Daniel Pipes saying, how come the IW articles  
22 haven't gone out, blah, blah, blah, since you  
23 started, like, being in charge of putting them  
24 out.

1                   And I said, it was -- and so I  
2 said, nobody did it before me. Four people have  
3 done this before me, never did, blah, blah, blah.

4                   So I went to the person who got  
5 rehired, that who was in the office who did that.  
6 And he pulled up the e-mail and said, no, three  
7 months ago they said we're not doing this  
8 anymore.

9                   So Greg -- and he was, like, --  
10 and Daniel and Greg were both on the e-mail  
11 thread.

12                  And so when Daniel pressured me on  
13 it, I said, it's on the e-mail thread that we  
14 weren't doing this. The whole thing was Greg is  
15 doing this retaliation.

16                  He knew that Daniel wouldn't  
17 remember. And so he's like, Lisa's not doing her  
18 job, to get me fired -- even though that there  
19 was a directive not to -- there was a directive  
20 not to do what he was accusing me of doing.

21                  And Daniel Pipes wouldn't have  
22 known about that. He said Greg came to him and  
23 said, it's come to -- Greg brought to my  
24 attention that you're not putting out the IW

1 articles.

2 And I was, like, there was a  
3 directive from three months ago for us not to.  
4 And then Daniel Pipes left it alone and never  
5 contacted me about it again, because he knew that  
6 that was true.

7 So, yes, Greg Roman was still  
8 making decisions. Still trying to get me fired.  
9 Still leering at me when he did see me. He was  
10 still always inappropriate.

11 Q. You told me earlier that in your  
12 view, Greg Roman was the one really in charge in  
13 the Forum, correct?

14 A. Correct. There's a perfect  
15 example of that.

16 Q. If he wanted you fired, couldn't  
17 he have just fired you?

18 MR. CARSON: Object to form.

19 THE DEPONENT: I don't know what  
20 Greg Roman's motives were for not firing  
21 me but there has to be cause and I was a  
22 very good employee.

23 BY MR. CAVALIER:

24 Q. What do you mean there has to be

1 cause?

2 MR. CARSON: I'm just gonna  
3 object. It calls for a legal conclusion,  
4 speculation. It's hypothetical.

5 Objection. You can answer.

6 THE DEPONENT: What would he fire  
7 me for if I'm good at my job? There's  
8 never been a performance issue. What  
9 would be the grounds for firing me?

10 BY MR. CAVALIER:

11 Q. In Pennsylvania, you don't need  
12 grounds for firing somebody. You can fire  
13 somebody if you don't like the color of the tie  
14 they're wearing.

15 MR. CARSON: Objection.

16 THE DEPONENT: Again --

17 MR. CARSON: Wait. Wait. Wait.

18 THE DEPONENT: Go ahead, Seth.  
19 Sorry.

20 MR. CARSON: I'm gonna object  
21 based on form.

22 It calls for a legal conclusion  
23 to what is and what is not an employee at  
24 will and the exceptions to that.

1                   To the extent you know the answer,  
2                   you can answer the question.

3                   THE DEPONENT: Listen, I am not --  
4                   I'm not gonna hear, like, take -- presume  
5                   Greg -- Greg Roman's, you know, reasons  
6                   for not firing me or firing me.

7                   I do know that he engaged in  
8                   retaliatory behavior to me non-stop and I  
9                   know this because I experienced it.

10          BY MR. CAVALIER:

11          Q.        Is every instance of disagreement  
12                   that you've had with Greg Roman post November 1,  
13                   2018, an instance of retaliation?

14          MR. CARSON: I'm gonna object to  
15                   the extent that that question is  
16                   argumentative and it's also misstating  
17                   prior testimony.

18                   Do you really want her to answer  
19                   that question? Do you want to rephrase  
20                   it?

21          MR. CAVALIER: I'd like -- if you  
22                   could answer, I'd like to hear your  
23                   answer.

24          MR. CARSON: I think the question

1                   is, is every time you disagreed with Greg  
2                   Roman an example of harassment or  
3                   retaliation?

4                   THE DEPONENT: Of course not. But  
5                   this isn't the case of disagreements.

6                   He can say, hey, I don't think  
7                   that this should be worded that way and  
8                   that's fine. That's not what he was  
9                   doing.

10                  He was engaged in a campaign of  
11                  putting me -- like I said, in this  
12                  particular example, with the project  
13                  directors' call, on the call everything  
14                  was fine. We had the conversation.

15                  Then he went to Daniel, said  
16                  something different. Didn't give him all  
17                  the information and with the intention of  
18                  making me look bad.

19                  And then when I had the evidence  
20                  to back it up, Daniel Pipes let it go.

21                  That is an instance of  
22                  retaliation.

23                  BY MR. CAVALIER:

24                  Q.            Well, you said Daniel Pipes let it

1 go. I mean, he agreed with you that you didn't  
2 do anything wrong, correct?

3 MR. CARSON: I'm gonna object.

4 Argumentative.

5 THE DEPONENT: Actually, I don't  
6 know what he agreed to or didn't agree  
7 to, because after I wrote that, he never  
8 responded to me at all.

9 BY MR. CAVALIER:

10 Q. But the issue went away, right?  
11 You weren't disciplined or anything?

12 MR. CARSON: Objection. You can  
13 answer.

14 THE DEPONENT: What are you gonna  
15 discipline me for if there's proof that I  
16 didn't do anything wrong?

17 BY MR. CAVALIER:

18 Q. Well, so I agree with you.  
19 But it sounds like you had a  
20 disagreement with Greg Roman. You brought the  
21 evidence to his boss and the issue went away.

22 MR. CARSON: Object to form.  
23 Argumentative. Assuming facts not in  
24 evidence. Misstating prior testimony.

You can answer.

THE DEPONENT: That's what I was just saying. You mischaracterized what I said. It was not a disagreement.

It was, was this being done, how comes it wasn't being done. Sam said, we're not going to do this. We decided we're not gonna do this.

Then he went and said something completely different to Daniel Pipes.

There was not a disagreement. We didn't disagree about anything. If he wanted me to put the articles out, I would have put the articles out. That's not what happened.

You mischaracterized that whole story.

BY MR. CAVALIER:

Q. Well, I understand all of that.

But your testimony was that you thought Greg was doing that to try to get you fired.

Correct?

MR. CARSON: Go ahead. You can

1 answer that question.

2 THE DEPONENT: Yes.

3 MR. CARSON: Was Greg doing that  
4 to get you fired?

5 BY MR. CAVALIER:

6 Q. Okay. But you weren't fired?

7 A. (No audible response.)

8 MR. CARSON: We can't hear you,  
9 Lisa. Say that again.

10 THE DEPONENT: Yes.

11 BY MR. CAVALIER:

12 Q. You weren't fired for this,  
13 correct?

14 MR. CARSON: Or were you fired?

15 THE DEPONENT: I was not fired.  
16 Actually, kind of.

17 I, mean they gave me -- the  
18 conditions were so terrible and so long,  
19 I, like, had to quit. I didn't want to  
20 quit.

21 I loved the mission. I'm a  
22 mission-oriented person. It was in  
23 Philly. It was near my kids.

24 I didn't want to have to go find a

1 new job. Do you know how hard it is for  
2 conservative people to find a  
3 conservative job in Philadelphia? Like  
4 almost impossible. I didn't want to  
5 quit, I had to, because they were so  
6 freaking awful.

7 BY MR. CAVALIER:

8 Q. We're talking about the issue  
9 about the radio show here.

10 A. This was ongoing. This happened  
11 all the time. And it wasn't about the radio  
12 show. You just mischaracterized it again. It  
13 was about the IW articles.

14 Q. Okay. So let's talk about the IW  
15 articles. You brought it to Daniel Pipes's  
16 attention.

17 You thought Greg was doing it,  
18 because he was trying to get you fired, correct?

19 A. Correct.

20 Q. But you were not fired for that,  
21 correct?

22 MR. CARSON: Objection. Asked and  
23 answered. Go ahead.

24 THE DEPONENT: Correct.

1 BY MR. CAVALIER:

2 Q. So the issue was then resolved  
3 favorably from your perspective, correct?

4 MR. CARSON: Objection.

5 THE DEPONENT: You're  
6 mischaracterizing what I'm saying.

7 Trying to get someone fired and it not  
8 happening is still harassment.

9 BY MR. CAVALIER:

10 Q. I'm not talking about harassment.

11 A. Well, what are you talking about?

12 Q. I'm just asking you whether the  
13 issue was resolved favorably to you.

14 A. It wasn't resolved because nobody  
15 addressed it. Daniel Pipes didn't say, oh, I'm  
16 sorry, Lisa, that, like, -- you know, I got poor  
17 information. He just ignored me like I was  
18 nothing. That's how he treated everyone.

19 MR. CARSON: I also didn't say  
20 objection. Argumentative.

21 THE DEPONENT: Sorry, Seth.

22 BY MR. CAVALIER:

23 Q. How do you know he just ignored  
24 you? How do you know what he did?

1 other George is, like, real young.

2 Q. Just to back up real quickly.

3 Do you -- so you're Director of  
4 Communications for Congressman Randy Weber right  
5 now, correct?

6 A. Yeah.

7 Q. Do you also manage his campaign  
8 social media fundraising?

9 A. Not his fundraising. But his  
10 campaign social media and some of the messaging.  
11 Not all of it.

12 Q. Okay. Are you paid separately for  
13 that?

14 A. I am.

15 Q. Okay. And so that's not part of  
16 your core job as Director of Communications?

17 A. I mean, it's part of my job.

18 Q. Okay.

19 A. Because of the way I have to do  
20 campaign work on my own time, and you can hire a  
21 certain amount of people to work on the campaign,  
22 like, that are actual staff members, as long as  
23 they do their work on their own time. And I get  
24 a nominal portion -- like a get a nominal amount

# **EXHIBIT 3**

# **Deposition of**

# **Gregg Roman**

IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

LISA BARBOUNIS,	) CIVIL ACTION - LAW
	)
Plaintiff	)
	)
-vs-	) NO. 2:19-cv-05030
	)
THE MIDDLE EAST FORUM, et	)
al.,	)
	)
Defendants	)
	X

\* \* \*

The recorded video deposition of GREGG ROMAN,  
taken remotely via Zoom, on Friday, November 20,  
2020, beginning at 11:28 a.m., before Carrie A.  
Kaufman, Registered Professional Reporter and Notary  
Public in and for the Commonwealth of Pennsylvania.

1 like -- you know, it's unconventional, okay, but it's  
2 still -- I would categorize it as educational. So I  
3 was a member of the civil guard's education program  
4 from June of -- July of 2006 until about September of  
5 2006, and then there in parallel I resumed my  
6 university studies at a place called the  
7 Interdisciplinary Center, IDC, Herzliya,  
8 H-e-r-z-l-i-y-a, I did that for a year, and then I  
9 actually got drafted -- I didn't volunteer, I got  
10 drafted, into the Israeli Army, so my university  
11 studies stopped there, and then I was first in a  
12 basic training in a place called Nitzan, N-i-t-z-a-n,  
13 which is in the south of the country, and then I went  
14 to the school for government and -- this is all as  
15 part of the Israeli Defense Forces, a place called  
16 Rishon Lezion, R-i-s-h-o-n L-e-z-i-o-n, and that was  
17 in December and January, December of 2008 and January  
18 of 2009, and then Operation Cast Lead broke out, so  
19 again a war interrupted with my studies, and I was on  
20 the frontlines in a place called Sderot, S-d-e-r-o-t,  
21 then the war ended, then I went back to the college  
22 for government, part of the IDF, in February of 2009,  
23 I graduated from that, and then I went to the school  
24 for advanced Israeli and Judaic studies, which was  
25 part of the Israel Defense Forces' education corps,

1 and that took place in July of 2010 I think, and then  
2 I got out of the army and went to the Ministry of  
3 Defense Reserves in October of 2010, I want to say,  
4 and then I went back to the IDC Herzliya, which was  
5 the college that I was at prior to my army  
6 enlistment, and I stopped studying -- I was doing  
7 political communications and national security  
8 studies there until May of 2012 and -- my daughter  
9 was born then, and then I stopped studying then to  
10 take a job in Pittsburgh where I then continued my  
11 studies at the Katz Graduate School of Business at  
12 the University of Pittsburgh where I was a joint sort  
13 of like lecturer and I audited classes. I have done  
14 some continue education since there, but, Mr. Carson,  
15 I never actually obtained my bachelor's degree, so I  
16 have about seven years of college under my belt but  
17 I'm missing those few credits to finish it. And so  
18 that's education but doesn't include the professional  
19 development. I just want to try to provide as clear  
20 a -- complete an answer as possible.

21 Q. No, that was a thorough answer for  
22 sure. It sounds like you have a degree in the  
23 college of life to me, but -- sometimes worth more  
24 than a bachelor's degree, but let me jump forward  
25 ahead and --

1 -- can you say where you were when you had that  
2 conversation?

3 A. No, it's of a general nature.

4 Q. Well, do you know -- were you in the  
5 Middle East Forum office? Was it over the phone? Do  
6 you know that?

7 A. No, I have not been in the Middle East  
8 Forum office at least between November -- was it even  
9 beforehand because I was in Los Angeles when many of  
10 these things were taking place, I wasn't even in  
11 Philadelphia until that weekend.

12 Q. So it was probably over the phone; is  
13 that fair to say?

14 A. Yeah. I have not been in the Middle  
15 East Forum office. I was not in the Middle East  
16 Forum office during this entire time, maybe one time  
17 to film a video and I was at Lisa Barbounis's  
18 initiation.

19 Q. When you say this entire time, what do  
20 you mean? From when to when?

21 A. Between the time that these allegations  
22 were made until now. I mean, I think I've been there  
23 probably twice.

24 Q. Okay. So it's fair to say that the at  
25 least one conversation you had with Mr. Pipes was

1 over the telephone.

2 A. Yeah, probably, and there was actually  
3 probably ten weeks between this taking place and  
4 January of 2019 where I didn't even see him. I was  
5 completely removed from the office.

6 Q. So we're just talking about  
7 conversations with Daniel Pipes in connection with  
8 Patricia McNulty's allegations of sexual harassment.

9 A. Right. But, again, Mr. Carson, there  
10 has to be specificity regarding these allegations  
11 because there are five different versions from my  
12 account --

13 Q. But there weren't five versions --

14 A. -- of what these accusations --

15 Q. Were there five versions in 2018?

16 A. There was multiple versions, yes.

17 Q. All right. What are the versions you  
18 remember there being in 2018?

19 A. Well, I don't remember the specific  
20 versions. I remember --

21 Q. Well, how do you know --

22 A. -- that there was an e-mail that I  
23 received which said that Lisa Barbounis, Tricia  
24 McNulty, and Marnie -- this is the words here, says  
25 they say --

1 Q. Did you --

2 A. -- want to -- hold on. Hold on. Hold  
3 on. Mr. Pipes, look, I've got a job, I've got three  
4 kids that I have to worry about, I have to pay my  
5 rent, I got to do things -- whatever you're saying,  
6 there will be a time to address the veracity and the  
7 truthfulness and the honesty of what these people are  
8 saying about me, but right now I'm going to work with  
9 you to try to make this problem mitigate itself and  
10 I'll do whatever you need me to do, and I even  
11 offered my resignation, Mr. Carson, if that's what  
12 you need me to do, and the conclusion at the end of  
13 the day when all this was over is that I was to go  
14 and start my own organization until Lisa Barbouris  
15 went back on her word, reneged on her complaints, and  
16 said I should come back to work with her as if though  
17 nothing ever happened. That's what happened,  
18 Mr. Carson.

19 Q. Do you -- do you understand why women  
20 might come -- not come forward and report sexual  
21 harassment the day it happens?

22 A. Mr. Carson, I'm not those women, so I  
23 can't comment on something that someone else might  
24 think.

25 Q. Well, can you think of any reasons why

1 it might be hard to do that?

2 A. Do what?

3 Q. For a woman to report information that  
4 has a personal sexual context to it.

5 A. Mr. Carson, I can and I can relate to  
6 that on a personal level.

7 Q. Going back to the AIPAC conference, can  
8 you please explain what that is, briefly?

9 A. What's what?

10 Q. What is the AIPAC conference? Is that  
11 an annual conference held in Washington D.C.?

12 A. Well, there's a few AIPAC conferences  
13 that take place.

14 Q. Well, in 2018 --

15 A. Some take place --

16 Q. In 2018 the Middle East Forum attended  
17 an AIPAC conference sometime around March; is that  
18 correct?

19 A. There was the American Israel Public  
20 Affairs policy conference that took place between  
21 March 3rd and March 6th or March 2nd and March 5th,  
22 if that's what you're referring to, yes.

23 Q. Yeah, I'm going to try to get us  
24 through this quickly. So the AIPAC conference in  
25 March of 2018, did you attend that along with Matt

1 Bennett and Patricia McNulty and Lisa Barbounis and  
2 Marnie Meyer?

3 A. Yes, and there was other people who  
4 attended with us as well.

5 Q. Understood. And you -- it's my  
6 understanding that you and Matt Bennett booked the  
7 Airbnb; is that right?

8 A. I actually think it was Lisa that  
9 booked the Airbnb.

10 Q. For you and Matt Bennett, correct?

11 A. Yes, and she also booked her own hotel  
12 room for her and Tricia and for Marnie after Tricia  
13 asked if Lisa and Marnie could go.

14 Q. Okay. And I believe that you went to  
15 the AIPAC conference over the -- over a weekend in  
16 March; is that right?

17 A. Well, you would have to tell me when it  
18 is, but usually it's Saturday -- or Friday to Tuesday  
19 depending on the year.

20 Q. And that first Friday during that AIPAC  
21 conference did the -- during that first AIPAC  
22 conference in March of 2018 did the Middle East Forum  
23 hold an event?

24 A. No.

25 Q. A dinner?

1 you order some pizza into the room or did you go get  
2 pizza on the way back there? How did that happen?

3 A. Raheem Kassam ordered pizza.

4 Q. Okay. And were you sitting on the  
5 couch next to Lisa Barbounis and Patricia McNulty?

6 A. When?

7 Q. When you got back to the Airbnb.

8 A. No, I don't think so.

9 Q. At no time did you sit on the couch  
10 with them.

11 A. I may have, but the exact time you're  
12 asking me if I did, I had conversations with the  
13 students, I played the game of Battleship with them  
14 -- we actually got this box of Battleship from one of  
15 the bars which was one of these board game bars,  
16 brought it back to the condo, whatever it was, and I  
17 remember that some people were taking pictures  
18 because the view was over Logan -- not Logan --  
19 anyways, one of the circles on Massachusetts Avenue,  
20 and then we were playing a game of Battleship, you  
21 know, the board game Battleship, at the dining room  
22 table, and the entire room was this, like, purple  
23 couch that extended like this, like an oval. The TV  
24 was to the left. There was a table for chess that  
25 came around. There was a dining room table which

1 off the record.

2 THE WITNESS: Sorry about that.

3 Is that better?

4 MR. CARSON: Back on the record.

5 THE VIDEO SPECIALIST: We're back  
6 on the record. It's 5:18 p.m.

7 BY MR. CARSON:

8 Q. Mr. Roman, did you take Lisa Barbounis  
9 to Israel?

10 A. Yes.

11 Q. Did you tell Daniel Pipes that you were  
12 going to take her to Israel?

13 A. When?

14 Q. When you took her to Israel.

15 A. I told Matt Bennett, I told Marnie  
16 Meyer, I told Tricia McNulty, I told EJ Kimball, I  
17 told --

18 Q. My question was --

19 A. -- most of the MEF staff, and I said to  
20 Mr. Pipes that there was a staff trip to Israel, but  
21 I never told him which staff went. So in terms of  
22 the general answer, yes, I said that she was going to  
23 Israel, but I never used her specific name.

24 Q. Why didn't you want Daniel Pipes to  
25 know that you were taking her?

1 staff, by the way, the story, too, about why we were  
2 taking these precautions. I was almost put into an  
3 Egyptian jail. If you're familiar with Cairo's  
4 Scorpion prison, Mr. Carson, it's where ISIS, Al  
5 Qaeda, Hezbollah, Muslim Brotherhood, all the bad  
6 guys are in. I was in a car about to be taken to the  
7 prison until an embassy official from this country we  
8 were dealing with said it's okay, he's fine, and then  
9 I went on my way to stay at the Four Seasons in Cairo  
10 next to the Giza Zoo, G-i-z-a Zoo. There's a few  
11 Four Seasons there. Across from the Nile River. The  
12 next day I got into a car with Mr. Dashti and we  
13 drove about two and a half hours out to a military  
14 base, an Egyptian military base, between Alexandria  
15 and Cairo --

16 Q. When is this?

17 A. -- where -- this is in January of 2018.

18 Q. Right. So we're about four months away  
19 from where we're talking about.

20 A. You're six weeks away from what we're  
21 talking about.

22 So we went there and -- like I said, it  
23 was around the time of the Superbowl, the Patriots  
24 were playing the Eagles. We watched that game in  
25 Israel, went to Italy, went to Egypt, and we came

1 back. There I have never been more afraid for my  
2 life besides the time that I was in the army because  
3 of the work that MEF was doing. I recorded a video  
4 with Matt Bennett which would be released in the  
5 event of my demise. And the reason I say all of this  
6 is because a man named Michael Levin who I was  
7 friends with died after being murdered by Hezbollah.  
8 A man named Steven Sotloff who was the second hostage  
9 killed by ISIS in September 2nd -- there is -- yeah,  
10 September 2nd, 2014 -- I saw him beheaded,  
11 Mr. Carson. I went into a downward spiral for the  
12 better part of a year between 2014 and 2015 because  
13 this is the subject of the kind of work that we do.  
14 If we don't take security precautions like the ones  
15 I'm laying out to you right now, people can die. I  
16 am not exaggerating this. If you would like to speak  
17 with anyone who is on our board or if you would like  
18 to speak with other staff who are involved in this --  
19 I've got a guy right now who has been rotting in a  
20 Turkish prison for the past three years because he  
21 didn't take proper security measures. So if you're  
22 asking me -- if you're asking me why there was an  
23 instruction to compartmentalize information from a  
24 relatively new employee who only been working with us  
25 for five to six months -- by the way, that employee

1 was the third person who was asked to go on this  
2 trip. First it was Bennett, a man who speaks Hebrew,  
3 then it was Meyer, someone who is 20 years my senior  
4 and has extensive experience who wanted to violate  
5 the security protocols that we had put in place so no  
6 one would be hurt, and lastly --

7 Q. How did she want --

8 A. Excuse me?

9 Q. How did she want to violate the  
10 security protocols?

11 A. If you stay in a hotel, when you are  
12 doing the kind of work that we were doing -- think  
13 about it for a second. You have staff that are  
14 there. You have someone cleaning your room. You  
15 have two people who are different. You have  
16 individuals that come and go. You have no ability to  
17 have physical security over your own space. Now, if  
18 you want to speak about the exact place where we  
19 were, I actually got pictures of that apartment that  
20 I would be very happy to make available to you.

21 Again, the architecture, the design, whatever else.  
22 And also there is a list of 15 people that we met  
23 with between March -- I'll give you the exact date,  
24 March 11th and March 15th, March 11th and March 16th,  
25 including representatives of Israel's intelligence

1 agencies, one of the commanders from Israel's police  
2 department, members of parliament, individuals who  
3 disagree with MEF, and we actually have affidavits  
4 that I know you asked about in Mr. Pipes' deposition,  
5 but also that -- can I talk to counsel for a second  
6 just to direct them to do something?

7 Mr. Cavalier, Mr. Gold, if you have  
8 those affidavits, please give them to Mr. Carson so  
9 he has more context for this.

10 They will attest to not just the manner  
11 of why we had to keep this secret, but they will also  
12 attest to the veracity of what I'm telling you right  
13 now in terms of the subject of this. In fact, it was  
14 Lisa Barbounis who worked on the presentation that  
15 eventually was given to a senior minister in the  
16 government of who I'm talking to, and that senior  
17 minister accepted the work that we were doing. So  
18 any mischaracterization of why information security  
19 protocols and compartmentalizing personnel --  
20 personnel and personal security at that time never  
21 told you the whole story, and if they did you would  
22 know all this of what I'm saying to you right now.

23 Q. So you did tell Marnie Meyer then that  
24 she couldn't go if she wanted to get her hotel room.

25 A. Hundred percent.

1 and if you go to the right, there is a kitchen --  
2 again, it's like this combined kitchen/living room  
3 area like we were talking about beforehand. There  
4 was a bomb shelter, a restroom, and another bedroom.  
5 So on the complete opposite ends of where people  
6 were.

7 Q. Is this a bedroom right here?

8 A. Yeah, back there, that's where she  
9 chose to stay.

10 Q. When you say she chose to stay there,  
11 how many rooms were in -- how many bedrooms were  
12 there?

13 A. Three.

14 Q. And was there -- where was the other  
15 two bedrooms?

16 A. So if you click there --

17 Q. Oh, you know why? It's a screen shot.  
18 That's why I can't -- it's not the website.

19 A. Actually, if you zoom in on those  
20 screen shots --

21 Q. They're going to be --

22 A. That's -- you can't really see --

23 Q. But, Mr. Roman, was it one of these two  
24 couches that you were on when she alleges that you  
25 put your foot up her butt?

1                   A.        Mr. Carson, that never happened, so I  
2 can't answer a question that's based on a factual  
3 predicate that never happened.

4                   Q.        Well, did the two of you sit on one of  
5 those two couches one night?

6                   A.        Could you be more specific?

7                   Q.        Yeah, did you come home drunk after  
8 going out and come back and start talking about  
9 inappropriate sexual things in front of Ms.  
10 Barbounis?

11                  A.        No, Mr. Carson, that never happened.

12                  Q.        You didn't try to have sex with Leah  
13 Merville while you were there?

14                  A.        No, Mr. Carson, and just in terms of  
15 general questions of a nature which may regard any  
16 intimacy or alleged intimacy, I'm going to invoke my  
17 privacy privilege under Israel's basic law for human  
18 dignity and liberty as amended in 1989.

19                  Q.        That's not a privilege you can invoke  
20 in this case.

21                  A.        Actually it is and I'm going to invoke  
22 that since the -- well, actually, if counsel has an  
23 answer to further give reason for that?

24                  Q.        I mean, look, you can do whatever you  
25 want, we'll just make a record of it and then we'll

1 deal with it --

2 A. Sure.

3 Q. So Ms. Barbounis alleges that you sat  
4 down on the couch next to her and put your foot under  
5 her butt and put it up there and then said now that  
6 my foot is up your butt or in your butt or next to  
7 your butt then I guess we can take our relationship  
8 to the next level or something of that nature. Did  
9 that happen?

10 A. No.

11 Q. Did you -- did you describe having  
12 sexual intercourse with Leah Merville to my client?

13 A. No.

14 Q. Did you say to my client how nice her  
15 body was when you were having sex with her?

16 A. No.

17 Q. Did you try to have sex with anyone  
18 else while you were in Israel besides Leah Merville?

19 A. Mr. Carson, again, that question is  
20 based on a factual predicate of an event that never  
21 happened, and, beyond that, I am not going to answer  
22 any questions that you ask that are related to a  
23 privacy privilege that I have as an Israeli citizen  
24 under Israel's basic law of human dignity and privacy  
25 1989.

1 Q. Mr. Roman, are you attempting to invoke  
2 a protection under Israeli law right now?

3 A. I am.

4 Q. Okay. All right. So my client alleges  
5 that you came back to the room and began to describe  
6 in detail different sexual encounters with different  
7 women. Did that happen?

8 A. No.

9 Q. My client alleges that you asked her  
10 for a blowjob when you got back to the room. Did  
11 that happen?

12 A. No, Mr. Carson, I find this offensive.

13 Q. It's important to -- for you to put  
14 your position on the record because these are  
15 certainly issues of material fact that are in  
16 dispute. So it's important that you dispute them. I  
17 think your counsel would probably agree with that.

18 My client alleges that during this trip  
19 you asked her to engage in different sexual acts with  
20 her, primarily -- maybe even exclusively, oral sex.  
21 Did that ever happen?

22 A. No.

23 Q. And after this trip my client alleges  
24 that you started treating her differently because she  
25 said no. Do you agree with that?

1 yes. Actually yes. In April of 2018 the Middle East  
2 Forum held a sexual harassment seminar that was led  
3 by -- I specifically remember this. It was led by  
4 Marnie Meyer. She had brought in a New Jersey state  
5 approved sexual harassment guide or whatever. I  
6 specifically remember Lisa Barbounis was there in the  
7 conference room. Tricia McNulty was there in the  
8 conference room. Brady, I don't know if she was  
9 working for us yet. Yonchek I think may have been  
10 working for us. And Marnie Meyer held the sexual  
11 harassment seminar. All the staff invited from all  
12 over the country was either participating in the  
13 office in Philadelphia or via Skype for business, and  
14 there was an element there where I said members of  
15 MEF staff -- I'm paraphrasing this now to the best of  
16 my recollection -- if there are any incidents of  
17 sexual harassment that you are aware of or if you  
18 ever become aware of them, this is the following  
19 procedure of what you have to do, and this is also  
20 codified in our personnel manual.

21 Q. Mr. Roman, you do understand that the  
22 question I asked you is when did you get back and  
23 then I said did you get back in April.

24 A. Well, I'm saying what happened is when  
25 I got back.

# **EXHIBIT 4**

## **Deposition of**

# **Delaney Yonchek**

1 -----  
2 LISA BARBOUNIS, : UNITED STATES DISTRICT COURT  
3 Plaintiff : EASTERN DISTRICT OF  
4 v. : PENNSYLVANIA  
5 MEF, et al., :  
6 Defendant : NO. 2:19-cv-05030-JDW  
7 -----  
8  
9

10 VIDEOTAPE DEPOSITION OF DELANEY YONCHEK,  
11 taken VIA ZOOM CONFERENCE on Tuesday, February 2,  
12 2021, commencing at 10:12 a.m. before Coleen Trifun,  
13 Court Reporter and Notary Public.  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24

1 Q. Okay. Thank you.

2 MS. BENSON: I think it's a good time  
3 for a break.

4 VIDEOGRAPHER: Okay.

5 The time is 11:14 a.m. and we're off  
6 the record.

7 - - -

8 (Whereupon, a brief recess was held off  
9 the record.)

10 - - -

11 VIDEOGRAPHER: The time is 11:40 a.m.  
12 and we're back on the record.

13 BY MS. BENSON:

14 Q. All right. Thanks.

15 So, Delaney, I think where we left off was  
16 we had just gone over the text messages regarding  
17 Lisa and your colleague -- excuse me, former  
18 colleague Benjamin.

19 What was your reaction when you received  
20 that text message from Lisa Barbounis?

21 MR. CARSON: Objection; asked and  
22 answered.

23 THE WITNESS: Regarding, as I stated  
24 before, I didn't want the message and I just didn't

1 care to know. I didn't want to know.

2 BY MS. BENSON:

3 Q. Why didn't you want to?

4 MR. CARSON: Objection; asked and  
5 answered.

6 THE WITNESS: Because I had nothing  
7 to do with it and I didn't want to know that  
8 information.

9 BY MS. BENSON:

10 Q. Did it make you feel uncomfortable?

11 A. Yes.

12 Q. Yes?

13 How so?

14 A. I don't want to know the, you know,  
15 interworkings of personal life. I don't know how  
16 much more to explain it.

17 Q. Did you report to anyone that it made you  
18 uncomfortable?

19 A. No, I didn't.

20 Q. Why not?

21 A. I didn't -- I didn't feel like I  
22 necessarily needed to. I don't know, I just didn't.

23 Q. Did you consider it?

24 A. I didn't.

1 Q. Did you share the -- the image with anyone  
2 other than Caitriona?

3 A. No.

4 Q. Did you tell anyone other than Caitriona?

5 A. No.

6 MR. CARSON: Objection; form.

7 BY MS. BENSON:

8 Q. Did you tell anyone other than Caitriona  
9 that Lisa told you she was sleeping with Benjamin?

10 A. No.

11 Q. You testified earlier before our break  
12 about Lisa's -- I think -- or I don't remember the  
13 word we used, we'll say sleeping with somebody by  
14 the name of Twin. Do you recall that?

15 A. I do.

16 Q. Are you aware of any other individuals  
17 that Lisa was sleeping with during her employment at  
18 MEF?

19 MR. CARSON: Objection form; asked  
20 and answered.

21 MS. BENSON: No, I -- sorry, to  
22 clarify, I previously asked about MEF employees or  
23 independent contractors.

24 MR. CARSON: Same objection.

THE WITNESS: Not that -- not that I can remember at all. I don't remember knowing that.

BY MS. BENSON:

Q. Do you know -- are you familiar with the name either Danny Tomo or Danny Thomas?

A. Yes.

Q. And what do you know about --

MR. CARSON: Object to form.

You want her to tell you everything  
she knows about him?

MS. BENSON: I do.

MR. CARSON: Okay.

You can say everything you know about Daniel Thomas.

MS. BENSON: Thank you.

THE WITNESS: I know that he was part of the England group that -- that MEF worked over there with.

BY MS. BENSON:

Q. Are you aware of Lisa having a sexual relationship with him?

A. I believe I overheard it from someone.

Like I think I overheard it in the office when --  
but I wasn't told directly.

# **EXHIBIT 5**

# **Email Chain**

# **Between Gregg**

# **Roman and Lisa**

# **Barbounis**

**Subject:** Re: EA Interview: Lisa Reynolds  
**Date:** Friday, September 15, 2017 at 10:49:14 AM Eastern Daylight Time  
**From:** Lisa Reynolds  
**To:** Matthew Bennett  
**CC:** Marnie Meyer, Gregg Roman  
**Attachments:** DOMeeting\_LDVA (2).docx, Final draft of Yemen.docx, GLS Parent letter 09142017.pdf, Lisa Reynolds – EA – Writing Sample.docx, MBDS Personal Satement.docx

Dear Mr. Bennett,

Attached is the writing assignment you have requested. I have also attached a few other writing samples so that you may have a clearer picture of my writing style in different contexts.

I look forward to meeting you today.

Sincerely,

Lisa Reynolds Barbounis

On Tue, Sep 12, 2017 at 1:13 PM, Matthew Bennett <[Bennett@meforum.org](mailto:Bennett@meforum.org)> wrote:

Dear Lisa,

I'm sorry for the confusion. Please complete the assignment as follows:

Select 5 of the 6 questions below and type your answers into a Word document:

1. Draft an email to a member of the board to request a meeting with the President.
2. Explain how you would plan, manage, and execute a speaking engagement for the Director.
3. What is one of your major strengths and one of your major weaknesses? How do they shape your work ethic?
4. Describe a past assignment that was too difficult for you. How did you overcome the challenge?
5. If you were your own supervisor, how would you manage yourself?
6. Describe your ideal working environment and office culture.

Save the doc as a PDF called "Lisa Reynolds – EA – Writing Sample" and email it to me.

In the body of the email, write a few sentences on "why you'd like to work at MEF".

If you have any other questions please let us know.

Thanks,

**Matthew Bennett**

Director of Development

Middle East Forum

Tel: [\(215\) 546-5406](tel:(215)546-5406)

Fax: [\(215\) 546-5409](tel:(215)546-5409)

[www.MEForum.org](http://www.MEForum.org)

**From:** Lisa Reynolds [mailto:[lisa.e.reynolds@gmail.com](mailto:lisa.e.reynolds@gmail.com)]  
**Sent:** Tuesday, September 12, 2017 11:03 AM  
**To:** Gregg Roman <[Roman@meforum.org](mailto:Roman@meforum.org)>  
**Cc:** Matthew Bennett <[Bennett@meforum.org](mailto:Bennett@meforum.org)>; Marnie Meyer <[meyer@meforum.org](mailto:meyer@meforum.org)>  
**Subject:** Re: EA Interview: Lisa Reynolds

Dear Mr. Roman and Mr. Bennett,

Thank you for taking the time to speak with me yesterday. I am looking forward to learning more about Middle East Forum and the Executive Assistant position. I do have an additional question. I received a LinkedIn message regarding the position that included an assignment asking me to answer 6 questions. However, there were only two questions listed. Would you like me to complete this assignment and submit it Wednesday or bring it to Friday's interview?

Please let me know if there is any additional material that I can provide. I look forward to meeting everyone on Friday.

Sincerely,

Lisa Reynolds Barbounis

On Mon, Sep 11, 2017 at 5:19 PM, Gregg Roman <[Roman@meforum.org](mailto:Roman@meforum.org)> wrote:

Dear Lisa,

This is to confirm your interview with MEF on Friday, September 15th at 3pm.

I will meet you in the lobby of [1650 Market Street](#) and escort you up to our offices.

Please call me on my cell when you arrive. The number is [609-300-9342](#).

If you have any questions just let me know.

We look forward to meeting you.

Thank you,

Matt

--

Lisa Reynolds

--  
Lisa Reynolds

# **EXHIBIT 6**

# **Reply to Offer by**

# **Lisa Barbounis**

## Offer Acceptance

**Sent** Mon Sep 25, 2017 at 8:00PM UTC-04:00 / Mon Sep 25, 2017 at 8:00PM EDT  
**From** Lisa Reynolds <lisa.e.reynolds@gmail.com>  
**To** Gregg Roman <Roman@meforum.org>  
**CC** Marnie Meyer  
**BCC**

---

Dear Gregg,

I am thrilled that you have decided to extend me an offer for the Executive Liaison position. I am more than pleased to accept the position. I truly believe I will make a positive contribution to your team.

I look forward to starting my new position October 16, 2017. If there is any additional paperwork or information you need prior to my start date, please let me know.

Thank you again.

Sincerely,

Lisa Reynolds Barbounis

# **EXHIBIT 7**

# **MEF Handbook**

## **Personnel Manual**

Effective May 2015

## **Middle East Forum**

1500 Walnut Street, Suite 1050  
Philadelphia, Pennsylvania 19102

(215) 546-5406

## **WELCOME TO THE MIDDLE EAST FORUM**

The Middle East Forum (“MEF” or “Forum”) is an independent, nonprofit organization that (1) promotes American interests in the Middle East; (2) protects Western values from Middle Eastern threats; (3) protects the right in the West to freely discuss Middle East policy, Islam, and related issues; and (4) encourages excellence in the study of the Middle East, Islam, and related issues. The MEF’s work includes research, publications, educational programs, media outreach, activism, and networking. As a catalyst for the exchange of ideas, it seeks to influence the intellectual climate in which American foreign policy is made.

## **RECEIPT OF THE MANUAL**

This policy handbook summarizes the MEF’s personnel practices and the benefits to which you may be entitled as our employee. Your signature on the acknowledgment page of this handbook indicates your agreement to abide by these policies as someone who MEF compensates on a scheduled basis. Your signature on the acknowledgment page of this handbook also indicates your understanding that no part of this handbook shall be construed as being an employment contract, either implied or expressed, between you and the MEF.

The MEF reserves the right to modify the statements, policies and benefits included in the handbook at any time, with or without notice.

## **AT WILL EMPLOYMENT**

Unless an employee has a written contract signed by the MEF president specifying an employment term, employment is “at will.” **This means that both the employee and the MEF have the right to terminate the employment relationship at any time, with or without notice, for any or no reason, with or without cause.**

## **SALARIES AND WAGES**

### **Work Week and Reporting**

The work week is Monday through Friday, 9:00 a.m. to 5:00 p.m. From time to time employees may be asked to work additional hours above the regular work schedule for events, programs, and other business operations.

Part-time employees must record their work hours on weekly time sheets.

## **Pay Schedule**

Paychecks are normally delivered on the 15<sup>th</sup> and the last day of every month, although these dates are subject to change.

## **Deductions**

Deductions from each employee's paycheck include the mandatory and voluntary deductions described below:

Mandatory deductions include federal, state, and local withholding taxes, the employee's portion of Social Security contributions, as well as any garnishments or any other deductions required by law.

Voluntary deductions are made only with the authorization of the employee. Voluntary deductions include sums designated for participation in pension plans.

An itemized statement of all deductions from the employee's wages accompanies each paycheck. Be certain to review your paycheck stub carefully each payday.

## **WORK PRODUCT**

MEF reserves all intellectual and proprietary rights to any work product, in part or whole, that is developed by an employee in the course of performance by the employee at MEF. Work that falls under this policy includes work that is initiated on a MEF directive or work for which MEF has raised funds to finance some or all of the work product. Work products that fall under this policy include but are not limited to books, articles, educational materials or media projects. MEF retains the right to claim an employee's work product as its sole property during any phase of production. It is the responsibility of the employee at the beginning phase of production to seek MEF's opinion as to whether a work product falls under this category.

The employee retains all intellectual property rights to any work product that the employee produces during the term of employment but wholly independent of and outside of employment by MEF.

## **TIME AWAY FROM WORK**

### **Holidays**

The Forum closes on New Year's Day, Memorial Day, Independence Day, Labor Day, Thanksgiving Day, and Christmas Day. If one of these holidays falls on a Saturday, the Forum will be closed on the preceding Friday; if it falls on a Sunday, then the following Monday.

For full-time employees holidays are paid working days.

## **Vacation**

**Administrative Staff.** The vacation year coincides with the calendar year. Vacation plans should be submitted to the employee's supervisor for approval as far in advance as possible. Every effort will be made to schedule vacations at the times most desired by the employees, but the MEF reserves the right to schedule the vacations of employees at such times as will not interfere with the orderly and efficient operation of the MEF and its rendition of services. Once the planned vacation is approved, the employee should notify the director and other colleagues who need to know.

Unless otherwise arranged, a full-time employee earns 12 vacation days per year for the first three years. After continuous employment for three years, a full-time employee earns 17 vacation days per year. After continuous employment for eight years, a full-time employee earns 22 vacation days per year.

Vacation credits begin immediately when an employee joins the MEF. During the first calendar year of employment, the employee earns vacation time at the rate of one day per month worked. If the employee starts work prior to the 15<sup>th</sup> of the month, the employee is entitled to a day of vacation for that month. If the employee starts work on the 15<sup>th</sup> of the month or later the employee will not be entitled to vacation time for that month. With the supervisor's permission, the employee may take vacation time not yet earned during the calendar year. If the employee has unused vacation time at the time of leaving the Forum, the employee is entitled to receive payment for the unused vacation time.

Part-time employees, interns, consultants, and temporary staff ordinarily do not accrue vacation credits.

Vacation salary equals the salary rate in effect when the vacation period begins. Up to five vacation days per year may be carried forward into the next year.

**Professional Staff.** Professional staff members do not have vacation time as such. They are responsible for their work being done well and in a timely fashion. They control their time, when they work and when they do not.

With this freedom comes responsibility: wherever they are and whatever they are doing, professional staff members are expected to stay in regular contact with the office and to fulfill their duties.

## **Jury Duty**

Full-time employees receive full pay for performing jury duty up to a maximum of 10 days. Please provide to the director a statement from the court clerk giving the number of days on duty and the rate paid each day. Any compensation received by the court for service as a juror will be deducted from the compensation remitted by the MEF during the same period. An employee required to be available for jury duty but not required to be in court is expected to report to work.

## **Military Leave**

The MEF provides military leaves to its employees to the full extent required under

applicable law. If an employee is a member of the National Guard or Reserves, and is directed to participate in periodic field training, he or she will receive unpaid military leave for a maximum period of 15 calendar days annually. Such leaves shall not affect normal vacation or benefits in any way.

Employees who are to serve in active duty will be granted unpaid leave of absence and will be reinstated upon return to the extent required by applicable statutes.

## **Sick Leave**

Eligibility for sick leave begins when an employee joins the MEF. During the first calendar year of employment, sick leave is earned one day per month up to a total of 10 sick days for that year. If the employee starts work prior to the 15<sup>th</sup> of the month, the employee is entitled to a sick day for that month. If the employee starts work on the 15<sup>th</sup> of the month or later the employee will not be entitled to a sick day for that month. After that, sick leave accrues at the rate of 10 days per year of service and may be used only for ill health (and not as vacation by another name).

Sick leave also extends to caring for immediate family members. For the purposes of this policy, immediate family members are parents, siblings, children or parents, siblings and children of an employee's spouse.

Unused sick leave is not carried forward into the next year. There is no pay for unused sick leave credits.

Employees missing work due to illness must contact their supervisor as soon as possible *before* they are scheduled to begin work, and must provide a contact number. Employees who are absent for more than one day must contact their supervisor each day that they are absent. The MEF may require that employees provide a doctor's note to substantiate illness.

If an employee is sick and out of the office for a period of time that exceeds the designated sick days, the employee may discuss with the director the possibility of making up this time in the evenings or on weekends or of using earned vacation time as sick days.

## **Childbirth-related Leave**

Employees shall give MEF adequate notice of an expected childbirth-related absence. Employees must first exhaust all accrued vacation and paid sick leave. MEF will then provide unpaid leave for the balance of a contiguous period of up to 12 weeks. Employees will not accrue benefits during this unpaid leave and will not be eligible for it unless they have been employed at MEF for the preceding 12 months.

## **Leaves of Absence**

**Professional.** Leaves of absence for work (research, writing, teaching) at other institutions may be requested by employees in good standing. Approval of such leaves is at the president's sole discretion in light of various factors including, without limitation, staffing needs and the reason for the leave. Employees will not accrue benefits during professional leaves of absence.

**Personal.** The MEF occasionally grants its employees leaves of absence for personal reasons.

Approval of such leaves is at the president's sole discretion in light of various factors including without limitation staffing needs and the reason for the leave. Employees will not accrue benefits during personal leaves of absence.

### **Bereavement/Death in the Family Policy**

Following a death in his or her immediate family, each employee will be entitled to be absent without loss of pay for a period extending up to but not more than 24 consecutive working hours (up to three days), depending on the person's normal work day.

For other close relatives, the employee shall be entitled to be absent the day of the funeral without loss of pay.

### **Personal Business**

Full-time employees may request of the director or their supervisor time off during working hours to conduct personal business that cannot ordinarily be conducted outside working hours. If permitted to take such time off, employees must make up the missed time in accordance with the direction of his or her direct supervisor or the director. Such requests must be made as far in advance as possible.

### **Breaks**

Administrative employees are entitled to a paid 15-minute break every four hours, or may take a paid 30 minute lunch break. Apart from these breaks, employees' time at the office should be spent on work-related tasks.

## **EMPLOYEE BENEFITS**

### **Health Insurance**

The MEF does not participate in a group medical plan. As a result of Obamacare, the Commonwealth of Pennsylvania offers its residents the option to purchase health insurance through a marketplace healthcare exchange. The Marketplace provides the services described in the Department of Labor fact sheet (which appears at the bottom of this document). The Marketplace can be accessed at <https://www.healthcare.gov/>. Any plan an employee selects will be the employee's sole responsibility and payments cannot be processed through payroll as a pre-tax deduction. However, an employee may be eligible for a premium tax credit under section [36B of the Internal Revenue Code](#) if the employee purchases a qualified health plan through the Marketplace.

### **Worker's Compensation**

Employees who become injured due to an on-the-job accident or illness may be entitled to benefits under Workers' Compensation Insurance.

Workers' Compensation requests must be made by using the appropriate Workers' Compensation Leave form as soon as the employee becomes aware of his or her disabling condition. The form must contain a statement from a physician describing the nature of the condition and projected leave. The MEF may also require that employees provide further medical evidence satisfactory to the MEF.

Failure to promptly report workplace injuries may jeopardize receipt of worker's compensation benefits.

When an employee wishes to return from Workers' Compensation leave, that employee must report his or her availability for work to his or her supervisor no less than one (1) week prior to the date on which he or she wish to return. The MEF may require that returning employees provide a physician's statement specifying that he or she is fit to return to work.

If an employee fails to report to work at the end of the approved Workers' Compensation leave or is working for another entity during the Workers' Compensation leave, employment with the MEF will be considered voluntarily terminated.

## **Pension**

### **1) TIAA-CREF**

The Forum pension plan currently is underwritten by the Teachers Insurance and Annuity Association-College Retirement Equities Fund (TIAA-CREF). Each TIAA retirement annuity contract and CREF certificate issued in accordance with this plan is for the sole purpose of providing a retirement and/or death benefit and is the property of the individual participant.

All employees are eligible to begin participation in the pension plan when their employment begins at the MEF.

### **2) Supplemental Retirement Annuity**

In addition to the pension plan, employees may contribute to a Supplemental Retirement Annuity. Additional information is available through the director.

## **OFFICE POLICIES**

### **Telephones**

Personal calls, incoming or outgoing, should be kept to a reasonable number and reasonable length of time.

Long distance calls on the MEF network of a personal nature should be noted as such on a record sheet; reimbursement for such calls will then be requested.

When possible, long distance calls involving MEF business should be made using Skype, Google, or other discounted carriers.

### **Postage**

To keep down postage costs, please inform the Receptionist whenever outgoing mail need not go at first-class or air-mail rates.

The postage meter is for MEF mail only. Should employees not have stamps and wish to use the meter, they may do so if they indicate to the Receptionist that the mail is personal and then reimburse the MEF for the cost of postage.

## **Dress Code**

Employees are expected to dress in business clothes and to maintain a neat, well-groomed, and professional appearance in connection with their work for MEF.

## **Purchases**

*Office supplies.* Requests should be submitted for approval to the office manager.

*Books and other materials.* Requests should be submitted for approval to the director.

## **Reimbursement for Travel**

The following concerns travel in fulfillment of work on behalf of the Forum, but not travel to the MEF office. These guidelines apply to both employees and independent contractors.

(1) *Research travel:* The president and each project head has at his disposal a maximum of \$2,500 a year for research purposes. Project heads may submit to the director requests for additional funds, which will be considered on a case-by-case basis.

(2) *Institutional travel:* MEF reimburses staff for travel expenses incurred on its behalf. A written description of the purpose and an estimate of costs provided to the director, whose permission must be given in advance. In keeping with MEF's frugal approach to spending, funds should be used in an economical and careful fashion.

After a trip, the traveler should within a week submit (1) a written, substantive report (i.e., meetings attended, individuals interviewed) to the president and (2) an expense account, with receipts, to the director.

## **Personal Use of MEF Property**

The MEF's equipment and services are the MEF's assets and are to be used for MEF business-related purposes and for reasonable legal personal purposes. Employees may not use the MEF's equipment or services, including but not limited to photocopy machines, fax machines, telephones and mail service, for illegal purposes.

Further, database information, addresses, and e-mail lists are MEF property and only to be used for MEF purposes and not for personal purposes.

## **Confidential Information**

All information and technology of MEF, the unauthorized disclosure of which would be detrimental to the interests of MEF ("MEF Confidential Information"), is solely the property of MEF. Employees must maintain all MEF Confidential Information in strict confidence and protect against its disclosure or dissemination. MEF Confidential Information is considered to include confidential information obtained from third parties. The foregoing obligations of

confidentiality and non-disclosure continue to apply after termination of employment with MEF.

Employees must not remove any MEF Confidential Information from MEF's premises or make copies of such materials except for use in MEF business.

Employees must return to MEF all MEF Confidential Information, and copies of the foregoing, at any time upon the request of MEF and, in any event and without such request, prior to or upon the termination of employment by MEF. Employees agree not to retain any copies of any MEF Confidential Information, in any form, after termination of employment for any reason.

If the employee is unsure as to whether any particular information is MEF Confidential Information, the employee shall treat it as such unless and until the employee has been advised otherwise by an authorized representative of MEF.

### **Moonlighting**

Any employee desiring to engage in any outside employment or consulting may do so provided it does not conflict with Forum goals or get in the way of fulfilling Forum duties.

### **Taglines**

Taglines (the short, identifying biographies in newspapers, magazines, television shows, etc.) are of great importance to the MEF: getting our name out is a critical way of showing sponsors what we've achieved; also, it gets our name into circulation, thereby increasing our opportunities and our support. It is critical that staff mention the Middle East Forum or subsidiary activities (*Middle East Quarterly*, Campus Watch, Islamist Watch, Legal Project, Washington Project) in their i.d.

Employees must show materials that mention the Middle East Forum to the president or someone he designates. The MEF assumes its employees are alert to the activities and interests of the organization, and that they consider these in their public utterances.

### **No Solicitation Policy**

Solicitation for any reason during working time is prohibited. Non-employees may not solicit on the MEF's property at any time for any reason. Employees are prohibited from distributing literature or other materials during working time and in working areas. Work time does not include those periods during the workday when employees legitimately are not engaged in performing their work tasks, such as break times, meal times or other specified breaks from work duties.

### **Contact with the general public**

Everyone at the Forum has contact with the public. It is important that each member of the staff recall that he is not just an individual but also a representative for the organization when dealing with the public. Please treat everyone as if he were a potential major donor, for one never knows. In case you have questions about an individual, please check with the director.

### **Contact with journalists**

From time to time, the Middle East Forum is in the news. (For an example, see <http://www.lobelog.com/dennis-ross-sits-on-board-for-daniel-pipess-journal/>.) If a journalist approaches you for information on the inner workings of the Forum or for a Forum position on an issue, please check with the president or director before giving a response. That means:

- Forward an e-mail question to the president or director; or
- If a reporter catches you on the phone or in person, say you are not authorized to discuss the topic. If the reporter presses further, take down his name and contact information, explaining you will pass it along to another staff member – but do not name the staff member.

## **Computers and Technology**

The following provisions apply to Users of MEF's Computer Resources.

### ***Definitions***

Terms referred to below require definition:

The term *Computer Resources* refers to MEF's entire computer network. Specifically, Computer Resources include, but are not limited to, host computers, file servers, application servers, communication servers, mail servers, fax servers, Web servers, workstations, stand-alone computers, laptops, software, data files, and all internal and external computer and communications networks (for example, Internet, commercial online services, value-added networks, and e-mail systems) that may be accessed directly or indirectly from our computer network.

The term *Users* refers to all employees, independent contractors, consultants, temporary workers, and other persons or entities that use MEF's Computer Resources.

### ***Prohibited activities***

**Waste of Computer Resources.** Users may not deliberately perform acts that waste Computer Resources or monopolize resources to the exclusion of others. These acts include, but are not limited to, sending mass mailings unrelated to MEF business, chain letters, spending time on the Internet unrelated to MEF business, playing games, engaging in online chat groups unrelated to MEF business, or otherwise wasting resources.

**Misuse of Software.** Without prior written authorization from the president, Users may not do any of the following: (1) copy software for use on their home computers; (2) provide copies of software to any independent contractors or to any third person; (3) install software on any MEF workstations or servers; (4) download any software from the Internet or other online service to any of the MEF workstations or servers; (5) modify, revise, transform, recast, or adapt any software; or (6) reverse-engineer, disassemble, or decompile any software. Users who become aware of any misuse of software or violation of copyright law should immediately report the incident to the president.

### ***Login IDs and Passwords***

**Responsibility for Login IDs and Passwords.** Users are responsible for safeguarding their login IDs and passwords for access to the computer system. Users are responsible for all transactions made using their login IDs and passwords. No User may access the computer system with another User's login ID or password without permission from the director or president.

**Passwords Do Not Imply Privacy.** Use of passwords to gain access to the computer system or to encode particular files or messages does not imply that Users have an expectation of privacy in the material they create or receive on the computer system. MEF has global passwords that permit access to all material stored on its computer system regardless of whether that material has been encoded with a particular User's password.

**Accessing Other Computers and Networks.** A User's ability to connect to other computer systems through the network or by a modem does not imply a right to connect to those systems or to make use of those systems unless specifically authorized by the operators of those systems.

### ***Viruses***

**Virus Detection.** Viruses can cause substantial damage to computer systems. Each User is responsible for taking precautions not to introduce viruses into the MEF network. To that end, all material received on external hard drives (including flash drives) and all material downloaded from the Internet or from computers or networks that do not belong to MEF MUST be scanned for viruses and other destructive program before being placed onto the computer system. Users should understand that their home computers and laptops might contain viruses. All disks transferred from these computers to the MEF network MUST be scanned for viruses. Please check with the director if you want to add material to the MEF network.

**Accessing the Internet.** To ensure security and avoid the spread of viruses, Users accessing the Internet through a computer attached to the MEF network must do so through an approved Internet firewall. Accessing the Internet directly, by modem, is strictly prohibited unless the computer being used is not connected to the MEF network or specific prior written authorization has been made by the director or president.

### **Blocking of Inappropriate Content.**

MEF may use software to identify inappropriate or sexually explicit Internet sites. Such sites may be blocked from access by MEF networks. In the event an employee nonetheless encounters inappropriate or sexually explicit material while browsing on the Internet, he or she must immediately disconnect from the site, regardless of whether the site was subject to MEF blocking software.

### **Games and Entertainment Software.**

Employees may not use MEF's Internet connection to download games or other entertainment software, or to play games over the Internet.

**Use of Encryption Software.**

Employees may not install or use encryption software on any of the MEF's computers without first obtaining written permission from the director or president.

**Export Restrictions.**

The federal government has imposed restrictions on export of programs or files containing encryption technology (such as e-mail programs that permit encryption of messages and electronic commerce software that encodes transactions). Software containing encryption technology is not to be placed on the Internet or transmitted in any way outside the United States without prior written authorization from the director or president.

**Violations.**

Failure to comply with this policy may result in appropriate disciplinary action, up to and including termination of employment.

**Electronic Mail, Voice Mail, and Internet Policy**

This policy is intended to provide guidelines regarding the use and administration of electronic mail ("e-mail"), voice mail, and Internet access at the Middle East Forum.

***E-mail and Voice Mail Communications are MEF Property***

E-mail and voice mail systems are available to assist employees in performing their work. Like the other software, hardware, and tools made available to and used by employees, the e-mail and voice mail systems and the information, work, and data contained therein are the property of MEF.

Electronic and voice mail communications are not private. They are business records that may be subject to subpoena or other legal investigation and may be introduced as evidence in a legal proceeding. MEF requires all employees to use passwords to gain access to e-mail and voice mail. The use of a password is for the protection of MEF, not the employee. Messages are not considered confidential even though a private password is used.

***Use of the Internet, E-mail and/or Voice Mail Systems***

MEF's e-mail and voice mail systems and access to the Internet are provided to employees for MEF business. Employees may use these systems occasionally for personal business, but excessive personal use is strictly prohibited. Visiting gaming or adult sites for personal use or any other purpose not in furtherance of MEF's business is prohibited. Moreover, these systems may not be used for transmitting junk mail or chain letters.

The Internet, e-mail, and voice mail systems shall not be used to send or retrieve inappropriate materials, including suggestive or discriminatory references, materials disparaging individuals on the basis of their race, color, creed, religion, age, gender, national origin, citizenship, veteran status, marital status, mental or physical handicap or disability, sexual orientation, gender

identity or other protected characteristics, or which are not consistent with or violate any other policy of MEF, including MEF policies regarding Equal Employment Opportunity and Sexual and Other Unlawful Harassment. Any use of these systems that is threatening, abusive, obscene, harassing, defamatory, or otherwise unprofessional and/or illegal is strictly prohibited.

The e-mail system may not be used to create, retrieve, and/or send any unauthorized copies of software or to otherwise violate applicable copyright laws. Employees are responsible for ensuring that their use of e-mail, voice mail, and the Internet complies with federal, state, local, and international law. Finally, downloading programs, data, or other material except as approved by the director or the president is prohibited because of the prevalence of viruses, potential incompatibility with MEF's hardware and software systems, and copyright issues.

Employees who misuse MEF's Internet, e-mail and/or voice mail systems or knowingly allow others to do so are subject to disciplinary action, up to and including termination of employment. Employees should report violations of this policy to the president.

#### ***Altering Attribution Information***

Employee must not alter the "From:" line or other attribution-of-origin information in e-mails, messages or postings in an attempt to deceive. Anonymous or pseudonymous electronic communications are forbidden. Employees must identify themselves honestly and accurately when participating in chat groups, making postings to newsgroups, sending e-mail, or otherwise communicating online.

#### ***Monitoring Internet, E-mail and Voice Mail Systems***

MEF reserves the right to access, monitor, and disclose the contents of e-mail and/or voice mail communications sent or received over its systems. MEF also reserves the right to monitor employees' use of its systems to access the Internet and to access, monitor, and disclose the contents of any material retrieved from or disseminated over the Internet through use of MEF's systems.

#### ***Protection of Confidential/Proprietary Information***

Employees must exercise special care to protect the proprietary and/or confidential information of MEF. Unauthorized transmission and/or disclosure of any confidential or proprietary information is strictly prohibited.

Use of MEF equipment for e-mail and/or voice mail communications constitutes an employee's agreement to abide by the terms of this policy and consent to MEF's access, monitoring, and disclosure described herein. As with all of its policies, MEF reserves the right to change or revoke this policy at any time, in its discretion, with or without notice.

## **PERFORMANCE AND DISCIPLINE**

## **Resignation**

Employees who voluntarily resign from their positions at the MEF are requested to give at least two (2) weeks notice in writing of their intent to resign. Depending on the circumstances, an employee may not be asked to continue work during the notice period and may instead be required to tender their resignation effective immediately.

## **Return of MEF Property upon Termination of Employment**

At the time of termination of employment, an employee must return all property and materials belonging to the MEF that were utilized in the employee's work, including all copies of institutional products in electronic, written and other forms. The employee must confirm this return of property and materials in writing.

## **NON-DISCRIMINATION AND ANTI-HARASSMENT**

### **Equal Employment Opportunity**

The MEF adheres to a policy of complete nondiscrimination with regard to employees and applicants for employment. Our policy is to provide equal employment opportunity for all our employees and applicants in compliance with applicable local, state and federal laws. Employment decisions will be made by the MEF without regard to non-work related factors, such as race, color, religion, sex, national origin, age, disability, citizenship, marital status, sexual orientation, veteran status or other protected status under applicable law.

### **Anti Harassment**

The MEF is committed to providing a work environment that is free of harassment of any kind. The MEF does not tolerate actions, words, jokes, or comments based on an individual's gender, pregnancy, race, color, national origin, ethnic background, age, religion, creed, disability, sexual orientation, veteran's status or any other legally-protected characteristic.

Harassment includes, without limitation, verbal harassment (epithets, derogatory statements, slurs), physical harassment (assault, physical interference with normal work or involvement), visual harassment (posters, cartoons, drawings), and innuendo.

***Sexual Harassment.*** Sexual harassment is a violation of state and federal law. It includes unwelcome sexual advances, requests for sexual favors, sexually motivated physical contact and other verbal or physical conduct, or visual forms of harassment of a sexual nature when:

The harasser states or implies that giving in to or rejecting such conduct will affect an individual's employment; or

such conduct unreasonably interferes with an individual's work performance or creates an intimidating, hostile or offensive work environment.

It is not possible to identify all of the conduct which could be sexual harassment. However, some common examples of conduct that might be sexual harassment include, but are not limited, to the following:

- threatening to, or actually making, job decisions, such as discharge, demotion or reassignment, if sexual favors are not granted;
- demanding sexual favors in exchange for favorable or preferential treatment;
- using stereotypes;
- unwelcome and/or repeated flirtations;
- propositions or advances;
- unwelcome physical contact;
- whistling in a manner directed toward the appearance of another;
- leering;
- improper gestures;
- tricks or horseplay;
- gender-related remarks which are offensive, insulting, derogatory or degrading;
- comments about appearance;
- sexual jokes or use of sexually explicit or offensive language, either in person, in writing or through e-mail;
- gender or sex-based pranks;
- the display in the workplace of sexually suggestive objects or pictures, including material from the Internet.

***Other Harassment.*** Harassment is not limited to sexual harassment. Statements or actions that ridicule or are critical of an individual because of his or her race, color, gender, age, religion, national origin, sexual orientation, disability, ancestry, veteran status or any other characteristic protected by law are offensive. Offensive conduct can create an intimidating, hostile work environment and may unreasonably interfere with the individual's work performance. Accordingly, offensive conduct is prohibited.

Again, this policy does not include a complete list of what conduct constitutes unlawful harassment. Some common examples of such harassment are:

- using epithets or slurs;
- mocking, ridiculing or mimicking another's culture, accent, appearance or customs;
- threatening, intimidating or engaging in hostile or offensive acts that focus on an individual's race, color, gender, age, religion, national origin, ancestry, sexual orientation, disability, veteran status or any other characteristic protected by law;

offensive jokes or pranks;  
posting offensive material on walls, bulletin boards, or elsewhere on MEF's premises;  
circulating offensive material in the workplace, by e-mail or otherwise.

***Reporting and Investigation.*** If you believe that you are the victim of impermissible harassment, or become aware of another employee being subjected to impermissible harassment, you must promptly report the facts of the incident to your supervisor or to the president or director. The MEF will promptly, appropriately and with as much confidentiality as possible investigate any reports of offensive conduct.

***Resolving the Matter.*** After the investigation, appropriate action will be taken. Any employee who is found to have engaged in harassment of another employee will be subject to disciplinary action up to and including discharge. If deemed appropriate, an accused harasser may be suspended without pay pending investigation. In all cases, we will advise the complaining employee and the accused of the outcome of the investigation.

***Non-Retaliation.*** You will not be retaliated against for reporting incidents that you believe to be violations of this policy. You also will not be retaliated against for participating in the investigation of a harassment complaint. Retaliation is a serious violation of this policy, and you should report any incidents of retaliation immediately. We will investigate and resolve reports of retaliation in the same manner as reports of harassment.

I acknowledge that I have received a copy of the Middle East Forum Employee Handbook.

Employee

A handwritten signature in blue ink that reads "Lisa R. Barbounis". The signature is fluid and cursive, with "Lisa" and "R." on the first line and "Barbounis" on the second line.

Lisa Reynolds-Barbounis

Dated: 09/25/2017

# **EXHIBIT 8**

## **Excerpts from**

## **MEF Personnel**

## **Manual**

## **Personnel Manual**

Effective May 2019

## **Middle East Forum**

1650 Market Street, Suite 3600  
Philadelphia, Pennsylvania 19103

(215) 546-5406

**NON-DISCRIMINATION AND ANTI-HARASSMENT****Equal Employment Opportunity**

The MEF adheres to a policy of complete nondiscrimination with regard to employees and applicants for employment. Our policy is to provide equal employment opportunity for all our employees and applicants in compliance with applicable local, state and federal laws.

Employment decisions will be made by the MEF without regard to non-work-related factors, such as race, color, religion, sex, national origin, age, disability, citizenship, marital status, sexual orientation, veteran status or other protected status under applicable law.

**Anti-Harassment**

The MEF is committed to providing a work environment that is free of harassment of any kind. All forms of harassment are a violation of state and federal law. Some common examples of conduct that are considered to be harassment include, but are not limited, to the following:

- Threatening to, or actually making, job decisions, such as discharge, demotion or reassignment, if sexual favors are not granted;
- Demanding sexual favors in exchange for favorable or preferential treatment;
- Unwelcome and/or repeated flirtations; propositions, advances, or physical contact
- Whistling, leering; or improper gestures in a manner directed toward the appearance of another
- ; Gender-related remarks which are offensive, insulting, derogatory or degrading;
- Sexual jokes or use of sexually explicit or offensive language, either in person, in writing or through e-mail;
- Gender or sex-based tricks or horseplay or pranks;
- The display in the workplace of sexually suggestive objects or pictures, including material from the Internet.
- Using epithets or slurs;
- Mocking, ridiculing or mimicking another's culture, accent, appearance or customs;
- Threatening, intimidating or engaging in hostile or offensive acts that focus on an individual's race, color, gender, age, religion, national origin, ancestry, sexual orientation, disability, veteran status or any other characteristic protected by law;

- Offensive jokes or pranks;
- Posting offensive material on walls, bulletin boards, or elsewhere on MEF's premises;
- Circulating offensive material in the workplace, by e-mail or otherwise.
- Any inference by a supervisor that implies that an individual's employment will be affected if they are not accepting of advances or mistreatment Any conduct that unreasonably interferes with an individual's work performance or creates an intimidating, hostile or offensive work environment.

#### Reporting and Investigation.

If you believe that you are the victim of impermissible harassment or become aware of another employee being subjected to impermissible harassment, you must promptly report the facts of the incident to your supervisor or to the president or director. The MEF will promptly, appropriately and with as much confidentiality as possible investigate any reports of offensive conduct.

#### Resolving the Matter.

After the investigation, appropriate action will be taken. Any employee who is found to have engaged in harassment of another employee will be subject to disciplinary action up to and including discharge. If deemed appropriate, an accused harasser may be suspended without pay pending investigation. In all cases, we will advise the complaining employee and the accused of the outcome of the investigation.

#### Non-Retaliation.

You will not be retaliated against for reporting incidents that you believe to be violations of this policy. You also will not be retaliated against for participating in the investigation of a harassment complaint. Retaliation is a serious violation of this policy, and you should report any incidents of retaliation immediately. We will investigate and resolve reports of retaliation in the same manner as reports of harassment.

## **PERFORMANCE AND DISCIPLINE**

#### Performance Assessments

At the end of each fiscal year employee's performance is reviewed by an individual's supervisor or the Director. Bonuses and increases are distributed at this time if funds allow.

# **EXHIBIT 9**

## **Plaintiff's**

# **Responses to**

# **Third Set of**

# **Requests for**

# **Admissions**

UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

LISA BARBOUNIS : CIVIL ACTION  
x Plaintiff, : NO. 2:19-cv-05030-JDW  
-vs- :  
THE MIDDLE EAST FORUM, et al. :  
Defendants. :

**PLAINTIFF LISA BARBOUNIS'S RESPONSES  
TO DEFENDANTS' THIRD REQUESTS FOR ADMISSIONS**

1. REQUEST FOR ADMISSION NO. 1: Admit that you made anti-Semitic comments about Gregg Roman while you were employed with The Forum.

RESPONSE:

Denied. Plaintiff, Lisa Barbouris's career with The Middle East Forum was predicated upon her passion for her pro-Israel philosophy. Prior to Plaintiff, Lisa Barbouris's reports of discrimination and harassment in the workplace, The Middle East Forum posted a public video that Plaintiff, Lisa Barbouris made. The video was premised upon Plaintiff's Lisa Barbouris's concern for growing antisemitism in the United States and abroad.

2. REQUEST FOR ADMISSION NO. 2: Admit that you received a promotion, bonus, and pay raise after you were appointed Director of Communications of the Middle East Forum in December 2018.

RESPONSE:

Denied as stated. Defendants Request for Admission is a non-sequitur and based upon a false premise. First, Defendant, The Middle East Forum and specifically Daniel Pipes never provided Plaintiff with an actual promotion to Director of The Middle East Forum. To the contrary, Plaintiff, Lisa Barbouris was never received a meaningful promotion. Plaintiff requested a promotion to Director of Communications because Plaintiff's job responsibilities had increased significantly and Plaintiff was doing more work with public relations for The Middle East Forum. Plaintiff explained that people she had to do business with on behalf of The Forum would take Plaintiff more seriously if Plaintiff had the title, Director of Communications. Accordingly, Plaintiff requested the promotion. Daniel Pipes responded that Plaintiff could hold herself out to the public as Director of Communications, however, Daniel Pipes was very clear that Plaintiff's title and promotion was in name only. Plaintiff did not receive a pay raise to go

with the promotion. Plaintiff did not receive a bonus. Plaintiff and the entire staff at The Middle East Forum had all taken on added work and responsibilities in and around the Spring 2019. Everyone was doing more work because The Middle East Forum had lost personnel. Defendant Greg Roman posed a significant risk to the safety of the female employees who worked at The Middle East Forum and was therefore not allowed to come into the office. This decision was made after several employees including Plaintiff reported that Defendant Greg Roman had committed sexual assaults and/or had maintained inappropriate quid pro quo sexual relationships with female staff. Matthew Bennett had left the Forum. So had other employees including Greg Roman's sister. Accordingly, Daniel Pipes extended a temporary salary increase to compensate the employees for added work. The temporary pay-raise was compensation for added work and not a bonus. The only other increase in pay that Plaintiff received was the standard cost of living increase which all employees who worked at The Middle East Forum received. Even the cost of living increase was executed based on Defendants discriminatory policies to which female employees were subjected. Female staff were subjected to discriminatory treatment by Daniel Pipes and Greg Roman. Defendant and the other female employees received a 2.8% cost of living increase. Matthew Bennett received a 6% cost of living increase. This is one of many examples where male staff were afforded benefits and pay denied to female staff.

3. REQUEST FOR ADMISSION NO. 3: Admit that you shared and/or provided information about your Complaint to a reporter from the Washington Examiner.

RESPONSE:

Denied. Plaintiff has not shared information about her Complaint which was filed in October 2019 with any reporters.

4. REQUEST FOR ADMISSION NO. 4: Admit that you shared and/or provided information about your Complaint to a reporter from the Washington Free Beacon.

RESPONSE:

Denied.

5. REQUEST FOR ADMISSION NO. 5: Admit that you shared and/or provided information about at least one of your accusations with a reporter from the Washington Free Beacon.

RESPONSE:

Denied.

6. REQUEST FOR ADMISSION NO. 6: Admit that you recorded fellow employees at The Forum without their knowledge and/or permission.

RESPONSE:

Plaintiff objects to this Request as Defendant is improperly using Request for Admissions as a discovery device. Rule 36 is not a discovery procedure Defendants are attempting to use Request for Admissions under Rule 36 to circumvent the limitations of discovery and specifically interrogatories. Defendants have deployed one-hundred-fourteen (114) Request for Admissions to Plaintiff, Lisa Barbounis and are attempting to ascertain information that is entirely unknown to Defendants in an attempt to explore issues. Moreover, Defendants are using Rule 36 in an attempt to harass, embarrass, and further retaliate against Plaintiff, Lisa Barbounis. It is clear that Defendants' counsel did not draft the Second and Third Set of Requests for Admissions. By way of further answer, Defendants Requests seeks only to embarrass, harass, and intimidate. Moreover, Defendants' Request is not confined to the scope of Rule 26(b)(1).

By way of further answer, Denied. Plaintiff did not record employees without their knowledge and permission. There was one incident where Plaintiff, Lisa Barbounis recorded a conversation with coworker, Marnie Meyer. Marnie Meyer was ultimately informed about the recording.

7. REQUEST FOR ADMISSION NO. 7: Admit that you played a recording for Thelma Prosser containing accusations against Gregg Roman from your iPhone.

RESPONSE:

Admitted. There is a recording where a reporter for the Washington Examiner details a horrific account when Defendant Greg Roman exposed himself to her and threatened her in order to compel her to engage in sexual relations with Defendant Greg Roman. Plaintiff, Lisa Barbounis informed an employee, Thelma Prosser, about the incident and played the recording for Thelma Prosser.

8. REQUEST FOR ADMISSION NO. 8: Admit that you played a recording for Gary Gambill containing accusations against Gregg Roman from your iPhone.

Admitted. There is a recording where a reporter for the Washington Examiner details a horrific account when Defendant Greg Roman exposed himself to her and threatened her in order to compel her to engage in sexual relations with Defendant Greg Roman. Plaintiff, Lisa Barbounis informed an employee, Gary Gambill, about the incident and played the recording for Gary Gambill.

9. REQUEST FOR ADMISSION NO. 9: Admit that you coerced Alana Goodman into being recorded and sharing her accusations with you about Gregg Roman.

RESPONSE:

Denied.

10. REQUEST FOR ADMISSION NO. 10: Admit that you attended a Halloween party with Alana Goodman in October of 2019.

RESPONSE:

Admitted.

11. REQUEST FOR ADMISSION NO. 11: Admit that you attended a New Year's Eve party at the Trump Hotel in Washington D.C. with Alana Goodman.

RESPONSE:

It is admitted that Plaintiff attended a party on Halloween. It is admitted that Alana Goodman was also part of the group of people with whom Plaintiff attended the party.

12. REQUEST FOR ADMISSION NO. 12: Admit that Gregg Roman introduced you to Alana Goodman.

RESPONSE:

Denied. Greg Roman did not introduce Plaintiff to Alana Goodman.

13. REQUEST FOR ADMISSION NO. 13: Admit that you sent videos via text message of your son George Barbounis, to Gregg Roman.

RESPONSE:

It is admitted that Plaintiff, Lisa Barbounis sent a video of her son to her supervisor, Defendant, Greg Roman. Defendant, Greg Roman constantly harassed Plaintiff after hours and attempted to engage Plaintiff to interact with Defendant, Greg Roman at inappropriate times when Plaintiff was spending time with her family. Plaintiff, Lisa Barbounis sent a video of her son to Defendant, Greg Roman so that Defendant, Greg Roman understood that Plaintiff could not interact with Defendant, Greg Roman after hours. This was yet another attempt to communicate to Defendant, Greg Roman that Plaintiff did not wish to be contacted at inappropriate times.

14. REQUEST FOR ADMISSION NO. 14: Admit that you shared information about your kidney problems, both verbally and in text messages, to Gregg Roman, in September 2018.

RESPONSE:

Plaintiff, Lisa Barbounis admits that she communicated her health issues to her direct supervisor in 2018 to make her supervisor aware that she was having health issues that might impact Plaintiff's ability to perform her job responsibilities. Plaintiff had ongoing kidney problems that required surgery in 2019.

15. REQUEST FOR ADMISSION NO. 15: Admit that Gregg Roman expressed an interest in promoting you to Deputy Chief of Staff of the Middle East Forum, in October 2018.

RESPONSE:

It is admitted that Defendant, Greg Roman informed Plaintiff, Lisa Barbounis that she might be considered for Deputy Chief of Staff. Defendant, Greg Roman made statements like this occasionally but never seriously considered Plaintiff for the position.

16. REQUEST FOR ADMISSION NO. 16: Admit that you filed a formal written complaint about Marnie O'Brien to Gregg Roman, a week before you complained about Gregg Roman to Daniel Pipes.

RESPONSE:

It is admitted that Defendant, Greg Roman instructed Plaintiff, Lisa Barbounis to provide a written report complaining about Marnie Meyer sometime around this time period. Defendant, Greg Roman pitted Marnie Meyer and Lisa Barbounis against one-another as part of Defendant, Greg Roman's attempt to avoid employees opposition to and reports of discrimination and harassment in the workplace.

17. REQUEST FOR ADMISSION NO. 17: Admit that you have snorted Adderall in the past two years.

RESPONSE:

Plaintiff objects to this Request as Defendant is improperly using Request for Admissions as a discovery device. Rule 36 is not a discovery procedure Defendants are attempting to use Request for Admissions under Rule 36 to circumvent the limitations of discovery and specifically interrogatories. Defendants have deployed one-hundred-fourteen (114) Request for Admissions to Plaintiff, Lisa Barbounis and are attempting to ascertain information that is entirely unknown to Defendants in an attempt to explore issues. Moreover, Defendants are using Rule 36 in an attempt to harass, embarrass, and further retaliate against Plaintiff, Lisa

Barbounis. It is clear that Defendants' counsel did not draft the Second and Third Set of Requests for Admissions. By way of further answer, Defendants Requests seeks only to embarrass, harass, and intimidate. Moreover, Defendants' Request is not confined to the scope of Rule 26(b)(1).

18. REQUEST FOR ADMISSION NO. 18: Admit that you have snorted Ritalin in the past two years.

RESPONSE:

Plaintiff objects to this Request as Defendant is improperly using Request for Admissions as a discovery device. Rule 36 is not a discovery procedure Defendants are attempting to use Request for Admissions under Rule 36 to circumvent the limitations of discovery and specifically interrogatories. Defendants have deployed one-hundred-fourteen (114) Request for Admissions to Plaintiff, Lisa Barbounis and are attempting to ascertain information that is entirely unknown to Defendants in an attempt to explore issues. Moreover, Defendants are using Rule 36 in an attempt to harassment, embarrass, and further retaliate against Plaintiff, Lisa Barbounis. It is clear that Defendants' counsel did not draft the Second and Third Set of Requests for Admissions. By way of further answer, Defendants Requests seeks only to embarrass, harass, and intimidate. Moreover, Defendants' Request is not confined to the scope of Rule 26(b)(1).

19. REQUEST FOR ADMISSION NO. 19: Admit that you are currently separated from your husband, Vasili Barbounis.

RESPONSE:

Plaintiff objects to this Request as Defendant is improperly using Request for Admissions as a discovery device. Rule 36 is not a discovery procedure Defendants are attempting to use Request for Admissions under Rule 36 to circumvent the limitations of discovery and specifically interrogatories. Defendants have deployed one-hundred-fourteen (114) Request for Admissions to Plaintiff, Lisa Barbounis and are attempting to ascertain information that is entirely unknown to Defendants in an attempt to explore issues. Moreover, Defendants are using Rule 36 in an attempt to harassment, embarrass, and further retaliate against Plaintiff, Lisa Barbounis. It is clear that Defendants' counsel did not draft the Second and Third Set of Requests for Admissions. By way of further answer, Defendants Requests seeks only to embarrass, harass, and intimidate. Moreover, Defendants' Request is not confined to the scope of Rule 26(b)(1).

20. REQUEST FOR ADMISSION NO. 20: Admit that Daniel Thomas' father requested you facilitate money transfers to his son Daniel Thomas.

RESPONSE:

It is admitted that Plaintiff, Lisa Barbounis informed Daniel Thomas's father that The Middle East Forum could and would not facilitate any money transfers to his son Daniel Thomas.

21. REQUEST FOR ADMISSION NO. 21: Admit that Daniel Thomas is a convicted criminal, having previously been jailed for the attempted armed kidnapping of Graham Page in 2016.

RESPONSE:

Plaintiff is not in a position to admit or deny Request Number 21. Plaintiff lacks personal knowledge to admit or deny this Request. The details of Daniel Thomas's legal issues are equally accessible to Defendants as Plaintiff. Accordingly, Plaintiff cannot admit or deny this Request.

22. RESPONSE FOR ADMISSION NO. 22: Admit that you have snorted cocaine in the United Kingdom, during the time you worked for The Forum.

RESPONSE:

Objection. Defendant's Request is intended to embarrass, harass, and intimidate Plaintiff, Lisa Barbounis. Moreover this request is not relevant, material, or discoverable. This request is also denied.

23. REQUEST FOR ADMISSION NO. 23: Admit that you were introduced to your current roommate, Sidney Watson, by fellow TR.News worker Avi Yemeni.

RESPONSE:

Plaintiff objects to this Request as Defendant is improperly using Request for Admissions as a discovery device. Rule 36 is not a discovery procedure Defendants are attempting to use Request for Admissions under Rule 36 to circumvent the limitations of discovery and specifically interrogatories. Defendants have deployed one-hundred-fourteen (114) Request for Admissions to Plaintiff, Lisa Barbounis and are attempting to ascertain information that is entirely unknown to Defendants in an attempt to explore issues. Moreover, Defendants are using Rule 36 in an attempt to harass, embarrass, and further retaliate against Plaintiff, Lisa

Barbounis. It is clear that Defendants' counsel did not draft the Second and Third Set of Requests for Admissions. By way of further answer, Defendants Requests seeks only to embarrass, harass, and intimidate. Moreover, Defendants' Request is not confined to the scope of Rule 26(b)(1).

24. REQUEST FOR ADMISSION NO. 24: Admit that Avi Yemeni and Sidney Watson were investigated by the FBI for allegedly making threats against Comedy Central staff.

RESPONSE:

Plaintiff is not in a position to admit or deny Request Number 24. Plaintiff lacks personal knowledge to admit or deny this Request. The details of other individual's legal issues are equally accessible to Defendants as Plaintiff. Accordingly, Plaintiff cannot admit or deny this Request.

25. REQUEST FOR ADMISSION NO. 25: Admit that Avi Yemeni was deported from the United States.

RESPONSE:

Plaintiff is not in a position to admit or deny Request Number 25. Plaintiff lacks personal knowledge to admit or deny this Request. The details of other individual's legal issues are equally accessible to Defendants as Plaintiff. Accordingly, Plaintiff cannot admit or deny this Request.

26. REQUEST FOR ADMISSION NO. ?6: Admit that you tried to prevent Avi Yemeni's deportation from the United States.

RESPONSE:

Plaintiff objects to this request as unrelated to the instant action. This request is immaterial and not relevant. By way of further answer, Plaintiff, Lisa Barbounis did provide some assistance to Avi Yemeni related to this issue.

27. REQUEST FOR ADMISSION NO. 27: Admit that you served as Director of Communications for TR.News, and online news portal ran by Tommy Robinson.

RESPONSE:

Plaintiff objects to this request as unrelated to the instant action. This request is immaterial and not relevant and not calculated to lead to the discovery of admissible evidence nor is this Request proportional to the needs of the instant litigation. By way of further answer, Plaintiff requested and received approval from Daniel Pipes and Defendant, Greg Roman to work with Tommy Robinson on her own time. Plaintiff first worked with Tommy Robinson at the direction and under the supervision of Defendant, Greg Roman. Plaintiff then worked with Tommy Robinson on Plaintiff's personal time. Plaintiff's request and Defendant's approval of Plaintiff's request to work with Tommy Robinson is well documented. Defendants never admonished Plaintiff and expressed no issue with Plaintiff working with Tommy Robinson under after Plaintiff reported Defendant, Greg Roman's severe and pervasive discrimination and harassment in the workplace in November 2018.

28. REQUEST FOR ADMISSION NO. 28: Admit that you used the Forum's Meltwater public relations system to send out press releases on behalf of Tommy Robinson.

RESPONSE:

Denied. Plaintiff did not use the Forum's Meltwater account to send out a press release on behalf of Tommy Robinson. Any and all press releases that were sent out using the Forum's Meltwater account, that related to Tommy Robinson, were sent on behalf of The Middle East Forum. Plaintiff was required to work with Tommy Robinson as part of her job responsibilities. Working with The Middle East Forum at the direction and supervision of Defendant, Greg Roman is the way in which Plaintiff, Lisa Barbounis learned about and met Tommy Robinson. The Middle East Forum issued press releases regarding Tommy Robinson.

29. REQUEST FOR ADMISSION NO. 29: Admit that you used the Forum's e-mail address provided to you to solicit a meeting with a New York Times reporter, to discuss Tommy Robinson's issues with the British Broadcasting Corporation.

RESPONSE:

Denied as stated. Defendant, The Middle East Forum and Defendant, Greg Roman instructed Plaintiff, Lisa Barbounis to set up a meeting to discuss Tommy Robinson's issues with the British Broadcasting Corporation. This was done at the direction and supervision of Defendant, Greg Roman.

30. REQUEST FOR ADMISSION NO. 30: Admit that you wiped your MEF issued computer before Mamie O'Brien suggested to you to look on Google to learn how to delete your personal information from your computer.

RESPONSE:

Plaintiff objects to this Request as Defendant is improperly using Request for Admissions as a discovery device. Rule 36 is not a discovery procedure Defendants are attempting to use Request for Admissions under Rule 36 to circumvent the limitations of discovery and specifically interrogatories. Defendants have deployed one-hundred-fourteen (114) Request for Admissions to Plaintiff, Lisa Barbounis and are attempting to ascertain information that is entirely unknown to Defendants in an attempt to explore issues. Moreover, Defendants are using Rule 36 in an attempt to harassment, embarrass, and further retaliate against Plaintiff, Lisa Barbounis. It is clear that Defendants' counsel did not draft the Second and Third Set of Requests for Admissions. By way of further answer, Defendants' Request is denied.

31. REQUEST FOR ADMISSION NO. 31: Admit that you instructed Delaney Yonchek how to erase her MEF issued computer.

RESPONSE:

Plaintiff objects to this Request as Defendant is improperly using Request for Admissions as a discovery device. Rule 36 is not a discovery procedure Defendants are attempting to use Request for Admissions under Rule 36 to circumvent the limitations of discovery and specifically interrogatories. Defendants have deployed one-hundred-fourteen (114) Request for Admissions to Plaintiff, Lisa Barbounis and are attempting to ascertain information that is entirely unknown to Defendants in an attempt to explore issues. Moreover, Defendants are using Rule 36 in an attempt to harassment, embarrass, and further retaliate against Plaintiff, Lisa Barbounis. It is clear that Defendants' counsel did not draft the Second and Third Set of Requests for Admissions. By way of further answer, Defendants' Request is denied.

32. REQUEST FOR ADMISSION NO. 32: Admit that you instructed Patricia McNulty how to erase her MEF issued computer.

RESPONSE:

Plaintiff objects to this Request as Defendant is improperly using Request for Admissions as a discovery device. Rule 36 is not a discovery procedure Defendants are attempting to use Request for Admissions under Rule 36 to circumvent the limitations of discovery and

specifically interrogatories. Defendants have deployed one-hundred-fourteen (114) Request for Admissions to Plaintiff, Lisa Barbounis and are attempting to ascertain information that is entirely unknown to Defendants in an attempt to explore issues. Moreover, Defendants are using Rule 36 in an attempt to harassment, embarrass, and further retaliate against Plaintiff, Lisa Barbounis. It is clear that Defendants' counsel did not draft the Second and Third Set of Requests for Admissions. By way of further answer, Defendants' Request is denied.

33. REQUEST FOR ADMISSION NO. 33: Admit that you contacted Lea Merville to discuss allegations against Gregg Roman.

RESPONSE:

Plaintiff objects to this Request as Defendant is improperly using Request for Admissions as a discovery device. Rule 36 is not a discovery procedure Defendants are attempting to use Request for Admissions under Rule 36 to circumvent the limitations of discovery and specifically interrogatories. Defendants have deployed one-hundred-fourteen (114) Request for Admissions to Plaintiff, Lisa Barbounis and are attempting to ascertain information that is entirely unknown to Defendants in an attempt to explore issues. Moreover, Defendants are using Rule 36 in an attempt to harassment, embarrass, and further retaliate against Plaintiff, Lisa Barbounis. It is clear that Defendants' counsel did not draft the Second and Third Set of Requests for Admissions. By way of further answer, Plaintiff, Lisa Barbounis contacted Lea Merville who informed Plaintiff that she never wanted to speak to Defendant, Greg Roman again, and that Defendant, Greg Roman did have an inappropriate sexual relationship with Lea Merville while Lea Merville was intern for The Middle East Forum. Defendant, Greg Roman propositioned Lea Merville with a quid pro quo sexual advances. Defendant, Greg Roman preyed upon Lea Merville while Lea Merville was an intern for The Middle East Forum.

34. REQUEST FOR ADMISSION NO. 34: Admit that you contacted Karys Melnitzer to see if she had information or allegations about Gregg Roman.

RESPONSE:

Plaintiff objects to this Request as Defendant is improperly using Request for Admissions as a discovery device. Rule 36 is not a discovery procedure Defendants are attempting to use Request for Admissions under Rule 36 to circumvent the limitations of discovery and specifically interrogatories. Defendants have deployed one-hundred-fourteen (114) Request for Admissions to Plaintiff, Lisa Barbounis and are attempting to ascertain information that is entirely unknown to Defendants in an attempt to explore issues. Moreover, Defendants are using Rule 36 in an attempt to harassment, embarrass, and further retaliate against Plaintiff, Lisa Barbounis. It is clear that Defendants' counsel did not draft the Second and Third Set of Requests for Admissions. By way of further answer, Defendants' Request is denied.

35. REQUEST FOR ADMISSION NO. 35: Admit that you hosted Eran Vasker at your AirBNB that you shared with Gregg Roman in Tel Aviv in March of 2018.

Plaintiff objects to this Request as Defendant is improperly using Request for Admissions as a discovery device. Rule 36 is not a discovery procedure Defendants are attempting to use Request for Admissions under Rule 36 to circumvent the limitations of discovery and specifically interrogatories. Defendants have deployed one-hundred-fourteen (114) Request for Admissions to Plaintiff, Lisa Barbounis and are attempting to ascertain information that is entirely unknown to Defendants in an attempt to explore issues. Moreover, Defendants are using Rule 36 in an attempt to harassment, embarrass, and further retaliate against Plaintiff, Lisa Barbounis. It is clear that Defendants' counsel did not draft the Second and Third Set of Requests for Admissions. By way of further answer, Defendants' Request is denied.

36. REQUEST FOR ADMISSION NO. 36: Admit that you hosted Gilad Ach at your AirBNB that you shared with Gregg Roman in Tel Aviv in March of 2018.

RESPONSE:

Plaintiff objects to this Request as Defendant is improperly using Request for Admissions as a discovery device. Rule 36 is not a discovery procedure Defendants are attempting to use Request for Admissions under Rule 36 to circumvent the limitations of discovery and specifically interrogatories. Defendants have deployed one-hundred-fourteen (114) Request for Admissions to Plaintiff, Lisa Barbounis and are attempting to ascertain information that is entirely unknown to Defendants in an attempt to explore issues. Moreover, Defendants are using Rule 36 in an attempt to harassment, embarrass, and further retaliate against Plaintiff, Lisa Barbounis. It is clear that Defendants' counsel did not draft the Second and Third Set of Requests for Admissions. By way of further answer, Defendants' Request is denied.

37. REQUEST FOR ADMISSION NO. 37: Admit that you confided to Gregg Roman the fact that you and your husband had engaged in a violent physical altercation against one another.

RESPONSE:

Plaintiff objects to this Request as Defendant is improperly using Request for Admissions as a discovery device. Rule 36 is not a discovery procedure Defendants are attempting to use Request for Admissions under Rule 36 to circumvent the limitations of discovery and specifically interrogatories. Defendants have deployed one-hundred-fourteen (114) Request for Admissions to Plaintiff, Lisa Barbounis and are attempting to ascertain information that is entirely unknown to Defendants in an attempt to explore issues. Moreover, Defendants are using

Rule 36 in an attempt to harassment, embarrass, and further retaliate against Plaintiff, Lisa Barbounis. It is clear that Defendants' counsel did not draft the Second and Third Set of Requests for Admissions. By way of further answer, Defendants' Request is denied.

38. REQUEST FOR ADMISSION NO. 38: Admit that you confided to Matthew Bennett that you and your husband had engaged in a violent physical altercation against one another.

RESPONSE:

Plaintiff objects to this Request as Defendant is improperly using Request for Admissions as a discovery device. Rule 36 is not a discovery procedure Defendants are attempting to use Request for Admissions under Rule 36 to circumvent the limitations of discovery and specifically interrogatories. Defendants have deployed one-hundred-fourteen (114) Request for Admissions to Plaintiff, Lisa Barbounis and are attempting to ascertain information that is entirely unknown to Defendants in an attempt to explore issues. Moreover, Defendants are using Rule 36 in an attempt to harassment, embarrass, and further retaliate against Plaintiff, Lisa Barbounis. It is clear that Defendants' counsel did not draft the Second and Third Set of Requests for Admissions. By way of further answer, Defendants' Request is denied.

39. REQUEST FOR ADMISSION NO. 39: Admit that you confided to Patricia McNulty that you and your husband had engaged in a violent physical altercation against one another.

RESPONSE:

Plaintiff objects to this Request as Defendant is improperly using Request for Admissions as a discovery device. Rule 36 is not a discovery procedure Defendants are attempting to use Request for Admissions under Rule 36 to circumvent the limitations of discovery and specifically interrogatories. Defendants have deployed one-hundred-fourteen (114) Request for Admissions to Plaintiff, Lisa Barbounis and are attempting to ascertain information that is entirely unknown to Defendants in an attempt to explore issues. Moreover, Defendants are using Rule 36 in an attempt to harassment, embarrass, and further retaliate against Plaintiff, Lisa Barbounis. It is clear that Defendants' counsel did not draft the Second and Third Set of Requests for Admissions. By way of further answer, Defendants' Request is denied.

40. REQUEST FOR ADMISSION NO. 40: Admit that you have been arrested by the police.

RESPONSE:

Plaintiff objects to this Request as Defendant is improperly using Request for Admissions as a discovery device. Rule 36 is not a discovery procedure Defendants are attempting to use Request for Admissions under Rule 36 to circumvent the limitations of discovery and specifically interrogatories. Defendants have deployed one-hundred-fourteen (114) Request for Admissions to Plaintiff, Lisa Barbounis and are attempting to ascertain information that is entirely unknown to Defendants in an attempt to explore issues. Moreover, Defendants are using Rule 36 in an attempt to harassment, embarrass, and further retaliate against Plaintiff, Lisa Barbounis. It is clear that Defendants' counsel did not draft the Second and Third Set of Requests for Admissions. By way of further answer, Plaintiff has never been accused or charged of a crime that is subject to discovery under Rule 26.

41. REQUEST FOR ADMISSION NO. 41: Admit that you have engaged in sexual intercourse with at least one unmarried man in the last five (5) years.

RESPONSE:

Plaintiff objects to this Request as Defendant is improperly using Request for Admissions as a discovery device. Rule 36 is not a discovery procedure Defendants are attempting to use Request for Admissions under Rule 36 to circumvent the limitations of discovery and specifically interrogatories. Defendants have deployed one-hundred-fourteen (114) Request for Admissions to Plaintiff, Lisa Barbounis and are attempting to ascertain information that is entirely unknown to Defendants in an attempt to explore issues. Moreover, Defendants are using Rule 36 in an attempt to harassment, embarrass, and further retaliate against Plaintiff, Lisa Barbounis. It is clear that Defendants' counsel did not draft the Second and Third Set of Requests for Admissions. By way of further answer, Defendants Requests seeks only to embarrass, harass, and intimidate.

42. REQUEST FOR ADMISSION NO. 42: Admit that you have engaged in sexual intercourse with a bartender who works, or used to work at the Oyster House restaurant and bar at least once in the last five (5) years.

RESPONSE:

Plaintiff objects to this Request as Defendant is improperly using Request for Admissions as a discovery device. Rule 36 is not a discovery procedure Defendants are attempting to use Request for Admissions under Rule 36 to circumvent the limitations of discovery and specifically interrogatories. Defendants have deployed one-hundred-fourteen (114) Request for Admissions to Plaintiff, Lisa Barbounis and are attempting to ascertain information that is entirely unknown to Defendants in an attempt to explore issues. Moreover, Defendants are using Rule 36 in an attempt to harass, embarrass, and further retaliate against Plaintiff, Lisa Barbounis. It is clear that Defendants' counsel did not draft the Second and Third Set of Requests for Admissions. By way of further answer, Defendants Requests seeks only to embarrass, harass, and intimidate.

43. REQUEST FOR ADMISSION NO. 43: Admit that on March 8, 2019, you specifically asked Gregg Roman, to return as Director of The Forum and work directly with you.

RESPONSE:

Denied as stated. Plaintiff agreed to allow Defendant, Greg Roman to return as Director of The Middle East Forum based on assurances by Daniel Pipes that Greg Roman that strict safeguards would be put in place to protect the female staff. Plaintiff, Lisa Barbounis's decision was made for the benefit of Daniel Pipes and The Middle East Forum.

44. REQUEST FOR ADMISSION NO. 44: Admit that on March 8, 2019, you approached Daniel Pipes about Gregg Roman's return as Director of The Forum.

RESPONSE:

Denied as stated. Plaintiff agreed to allow Defendant, Greg Roman to return as Director of The Middle East Forum based on assurances by Daniel Pipes that Greg Roman that strict safeguards would be put in place to protect the female staff. Plaintiff, Lisa Barbounis's decision was made for the benefit of Daniel Pipes and The Middle East Forum. Plaintiff approached Daniel Pipes to discuss the way in which Defendant Greg Roman could help The Middle East Forum without putting the female staff at risk.

45. REQUEST FOR ADMISSION NO. 45: Admit that on March 8, 2019, you averred that The Forum needed Gregg Roman back in order to provide it with direction and leadership.

RESPONSE:

It is admitted that Plaintiff, Lisa Barbounis conceded that The Middle East Forum was floundering in the months after Defendant, Greg Roman was ejected from the offices because of the safety risk he posed to the female staff. It is admitted that Plaintiff, Lisa Barbounis admitted that having Defendant, Greg Roman return would help The Middle East Forum get back on track. It is admitted that Plaintiff prioritized The Middle East Forum as an organization over her personal fears and issues related to working with Defendant, Greg Roman. Moreover, Plaintiff, Lisa Barbounis put her trust in Daniel Pipes and Mark Fink to enforce the safeguards put in place for the protection of the female staff.

46. REQUEST FOR ADMISSION NO. 46: Admit that on March 9, 2019, there was a in-person staff meeting held at The Forum 's office.

RESPONSE:

Admitted.

47. REQUEST FOR ADMISSION NO. 47: Admit that you attended the in-person staff meeting held at The Forum on March 9, 2019.

RESPONSE:

Admitted.

48. REQUEST FOR ADMISSION NO. 48: Admit that during the in-person meeting you agreed to have Gregg Roman return as Director of The Forum.

RESPONSE:

See Plaintiff's responses to Request for Admission Numbers 44 and 45, above.

49. REQUEST FOR ADMISSION NO. 49: Admit that on March 11, 2019, you sent an email to Marc Fink agreeing to have Gregg Roman return as Director of The Forum.

RESPONSE:

See Plaintiff's responses to Request for Admission Numbers 44 and 45, above. Moreover, the email speaks for itself. Defendants required Plaintiff and Plaintiff's female coworkers to send the email referenced here.

50. REQUEST FOR ADMISSION NO. 50: Admit that you were charged with assault in New Jersey within the past eleven (11) years.

RESPONSE:

Plaintiff objects to this Request as Defendant is improperly using Request for Admissions as a discovery device. Rule 36 is not a discovery procedure Defendants are attempting to use Request for Admissions under Rule 36 to circumvent the limitations of discovery and specifically interrogatories. Defendants have deployed one-hundred-fourteen (114) Request for Admissions to Plaintiff, Lisa Barbounis and are attempting to ascertain information that is entirely unknown to Defendants in an attempt to explore issues. Moreover, Defendants are using Rule 36 in an attempt to harass, embarrass, and further retaliate against Plaintiff, Lisa Barbounis. It is clear that Defendants' counsel did not draft the Second and Third Set of Requests for Admissions. By way of further answer, Defendants Requests seeks only to embarrass, harass, and intimidate. Moreover, Defendants' Request is not confined to the scope of Rule 26(b)(1).

51. REQUEST FOR ADMISSION NO. 51: Admit that you were charged with assault for attempting to hit Joseph Fortuna with a frying pan in New Jersey.

RESPONSE:

Plaintiff objects to this Request as Defendant is improperly using Request for Admissions as a discovery device. Rule 36 is not a discovery procedure Defendants are attempting to use Request for Admissions under Rule 36 to circumvent the limitations of discovery and specifically interrogatories. Defendants have deployed one-hundred-fourteen (114) Request for Admissions to Plaintiff, Lisa Barbounis and are attempting to ascertain information that is entirely unknown to Defendants in an attempt to explore issues. Moreover, Defendants are using Rule 36 in an attempt to harassment, embarrass, and further retaliate against Plaintiff, Lisa Barbounis. It is clear that Defendants' counsel did not draft the Second and Third Set of Requests for Admissions. By way of further answer, Defendants Requests seeks only to embarrass, harass, and intimidate. Moreover, Defendants' Request is not confined to the scope o Rule 26(b)(1).

52. REQUEST FOR ADMISSION NO. 52: Admit that you were required to attend anger management classes within the past eleven (11) years.

RESPONSE:

Plaintiff objects to this Request as Defendant is improperly using Request for Admissions as a discovery device. Rule 36 is not a discovery procedure Defendants are attempting to use Request for Admissions under Rule 36 to circumvent the limitations of discovery and specifically interrogatories. Defendants have deployed one-hundred-fourteen (114) Request for Admissions to Plaintiff, Lisa Barbounis and are attempting to ascertain information that is entirely unknown to Defendants in an attempt to explore issues. Moreover, Defendants are using Rule 36 in an attempt to harassment, embarrass, and further retaliate against Plaintiff, Lisa Barbounis. It is clear that Defendants' counsel did not draft the Second and Third Set of Requests for Admissions. By way of further answer, Defendants Requests seeks only to embarrass, harass, and intimidate. Moreover, Defendants' Request is not confined to the scope of Rule 26(b)(1). Moreover, Defendants' Request is denied.

53. REQUEST FOR ADMISSION NO. 53: Admit that you have been audited by the Internal Revenue Service within the past ten ( 10) years.

Plaintiff objects to this Request as Defendant is improperly using Request for Admissions as a discovery device. Rule 36 is not a discovery procedure Defendants are attempting to use Request for Admissions under Rule 36 to circumvent the limitations of discovery and specifically interrogatories. Defendants have deployed one-hundred-fourteen (114) Request for Admissions to Plaintiff, Lisa Barbounis and are attempting to ascertain information that is entirely unknown to Defendants in an attempt to explore issues. Moreover, Defendants are using Rule 36 in an attempt to harassment, embarrass, and further retaliate against Plaintiff, Lisa Barbounis. It is clear that Defendants' counsel did not draft the Second and Third Set of Requests for Admissions. By way of further answer, Defendants Requests seeks only to

embarrass, harass, and intimidate. Moreover, Defendants' Request is not confined to the scope of Rule 26(b)(1).

54. REQUEST FOR ADMISSION NO. 54: Admit that you have outstanding tax liens and are currently on a payment plan with the Internal Revenue Service.

RESPONSE:

Plaintiff objects to this Request as Defendant is improperly using Request for Admissions as a discovery device. Rule 36 is not a discovery procedure Defendants are attempting to use Request for Admissions under Rule 36 to circumvent the limitations of discovery and specifically interrogatories. Defendants have deployed one-hundred-fourteen (114) Request for Admissions to Plaintiff, Lisa Barbounis and are attempting to ascertain information that is entirely unknown to Defendants in an attempt to explore issues. Moreover, Defendants are using Rule 36 in an attempt to harassment, embarrass, and further retaliate against Plaintiff, Lisa Barbounis. It is clear that Defendants' counsel did not draft the Second and Third Set of Requests for Admissions. By way of further answer, Defendants Requests seeks only to embarrass, harass, and intimidate. Moreover, Defendants' Request is not confined to the scope of Rule 26(b)(1).

55. REQUEST FOR ADMISSION NO. 55: Admit that you have outstanding student loan debt.

RESPONSE:

Plaintiff objects to this Request as Defendant is improperly using Request for Admissions as a discovery device. Rule 36 is not a discovery procedure Defendants are attempting to use Request for Admissions under Rule 36 to circumvent the limitations of discovery and specifically interrogatories. Defendants have deployed one-hundred-fourteen (114) Request for Admissions to Plaintiff, Lisa Barbounis and are attempting to ascertain information that is entirely unknown to Defendants in an attempt to explore issues. Moreover, Defendants are using Rule 36 in an attempt to harassment, embarrass, and further retaliate against Plaintiff, Lisa Barbounis. It is clear that Defendants' counsel did not draft the Second and Third Set of Requests for Admissions. By way of further answer, Defendants Requests seeks only to embarrass, harass, and intimidate. Moreover, Defendants' Request is not confined to the scope of Rule 26(b)(1).

56. REQUEST FOR ADMISSION NO. 56: Admit that you received foreclosure notices on your home within the past five (5) years.

RESPONSE:

Plaintiff objects to this Request as Defendant is improperly using Request for Admissions as a discovery device. Rule 36 is not a discovery procedure Defendants are attempting to use Request for Admissions under Rule 36 to circumvent the limitations of discovery and specifically interrogatories. Defendants have deployed one-hundred-fourteen (114) Request for Admissions to Plaintiff, Lisa Barbounis and are attempting to ascertain information that is entirely unknown to Defendants in an attempt to explore issues. Moreover, Defendants are using Rule 36 in an attempt to harassment, embarrass, and further retaliate against Plaintiff, Lisa Barbounis. It is clear that Defendants' counsel did not draft the Second and Third Set of Requests for Admissions. By way of further answer, Defendants Requests seeks only to embarrass, harass, and intimidate. Moreover, Defendants' Request is not confined to the scope of Rule 26(b)(1).

57. REQUEST FOR ADMISSION NO. 57: Admit that you were separated from your husband, Vasili Barbounis, within the past two (2) years.

RESPONSE:

Plaintiff objects to this Request as Defendant is improperly using Request for Admissions as a discovery device. Rule 36 is not a discovery procedure Defendants are attempting to use Request for Admissions under Rule 36 to circumvent the limitations of discovery and specifically interrogatories. Defendants have deployed one-hundred-fourteen (114) Request for Admissions to Plaintiff, Lisa Barbounis and are attempting to ascertain information that is entirely unknown to Defendants in an attempt to explore issues. Moreover, Defendants are using Rule 36 in an attempt to harassment, embarrass, and further retaliate against Plaintiff, Lisa Barbounis. It is clear that Defendants' counsel did not draft the Second and Third Set of Requests for Admissions. By way of further answer, Defendants Requests seeks only to embarrass, harass, and intimidate. Moreover, Defendants' Request is not confined to the scope of Rule 26(b)(1).

58. REQUEST FOR ADMISSION NO. 58: Admit that you used funds from The Forum to attend a conference in Brussels where you invited and paid for Daniel Thomas to attend.

RESPONSE:

Plaintiff objects to this Request as Defendant is improperly using Request for Admissions as a discovery device. Rule 36 is not a discovery procedure Defendants are attempting to use Request for Admissions under Rule 36 to circumvent the limitations of discovery and specifically interrogatories. Defendants have deployed one-hundred-fourteen (114) Request for Admissions to Plaintiff, Lisa Barbounis and are attempting to ascertain information that is entirely unknown to Defendants in an attempt to explore issues. Moreover, Defendants are using Rule 36 in an attempt to harass, embarrass, and further retaliate against Plaintiff, Lisa Barbounis. It is clear that Defendants' counsel did not draft the Second and Third Set of Requests for Admissions. By way of further answer, Defendants Requests seeks only to embarrass, harass, and intimidate. Moreover, Defendants' Request is not confined to the scope o Rule 26(b)(1). Moreover, Defendants' Request is denied.

59. REQUEST FOR ADMISSION NO. 59: Admit that you advocated for a \$32,000 payment to Daniel Thomas to stage a rally in front of the House of Commons for a free speech case in June 2018.

RESPONSE:

Denied as stated. Plaintiff, Lisa Barbounis was assigned to the project referenced in Request for Admission 59 by Defendant, Greg Roman. Defendant, Greg Roman oversaw, supervised, and was involved in all decisions related to this assignment. Plaintiff, Lisa Barbounis worked on the assignment at the direction and under the supervision of Defendant, Greg Roman. All recommendations made by Plaintiff, Lisa Barbounis were made in the interest of the objectives that Defendant, Greg Roman and The Middle East Forum provided to Plaintiff, Lisa Barbounis.

60. REQUEST FOR ADMISSION NO. 60: Admit that The Forum was lied to about the amount of expenses to stage the rally mentioned in Request No. 59.

RESPONSE:

Plaintiff does not possess the personal knowledge required to admit or deny Request for Admissions Number 60.

61. REQUEST FOR ADMISSION NO. 61: Admit that you purchased clothing, flights, hotels, and other items for Daniel Thomas while you were an employee with The Forum.

RESPONSE:

Plaintiff objects to this Request as Defendant is improperly using Request for Admissions as a discovery device. Rule 36 is not a discovery procedure Defendants are attempting to use Request for Admissions under Rule 36 to circumvent the limitations of discovery and specifically interrogatories. Defendants have deployed one-hundred-fourteen (114) Request for Admissions to Plaintiff, Lisa Barbounis and are attempting to ascertain information that is entirely unknown to Defendants in an attempt to explore issues. Moreover, Defendants are using Rule 36 in an attempt to harassment, embarrass, and further retaliate against Plaintiff, Lisa Barbounis. It is clear that Defendants' counsel did not draft the Second and Third Set of Requests for Admissions. By way of further answer, Defendants Requests seeks only to embarrass, harass, and intimidate. Moreover, Defendants' Request is not confined to the scope o Rule 26(b)(1).

62. REQUEST FOR ADMISSION NO. 62: Admit that you requested reimbursement for the clothing, flights, hotels, and other items that were purchased for Daniel Thomas.

RESPONSE:

Plaintiff objects to this Request as Defendant is improperly using Request for Admissions as a discovery device. Rule 36 is not a discovery procedure Defendants are attempting to use Request for Admissions under Rule 36 to circumvent the limitations of discovery and specifically interrogatories. Defendants have deployed one-hundred-fourteen (114) Request for Admissions to Plaintiff, Lisa Barbounis and are attempting to ascertain information that is entirely unknown to Defendants in an attempt to explore issues. Moreover, Defendants are using Rule 36 in an attempt to harassment, embarrass, and further retaliate against Plaintiff, Lisa Barbounis. It is clear that Defendants' counsel did not draft the Second and Third Set of Requests for Admissions. By way of further answer, Defendants Requests seeks only to embarrass, harass, and intimidate. Moreover, Defendants' Request is not confined to the scope o Rule 26(b)(1). Moreover, Request for Admission Number 62 is denied.

**DEREK SMITH LAW GROUP, PLLC**

By: /s/ Seth D. Carson  
SETH D. CARSON  
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E: [seth@dereksmithlaw.com](mailto:seth@dereksmithlaw.com)  
Attorneys for Plaintiff  
Lisa Barbounis

DATED: April 7, 2020

**CERTIFICATE OF SERVICE**

I hereby certify that on this date that I caused a true and correct copy of Plaintiff's Responses to Defendants' Requests for Admissions to be served via email to:

David J. Walton (PA # 86019)  
Leigh Ann Benson (PA #319406)  
Cozen O'Connor  
1650 Market Street, Suite 2800  
Philadelphia, PA 19103  
P: 215-665-2000  
F: 215-665-2013  
[dwalton@cozen.com](mailto:dwalton@cozen.com)  
[lbenson@cozen.com](mailto:lbenson@cozen.com)

**DEREK SMITH LAW GROUP, PLLC**

BY: /s/ Seth D. Carson  
SETH D. CARSON

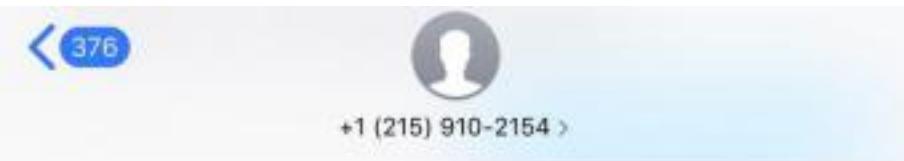
DATED: April 7, 2020

**EXHIBIT 10**

**Text Message**

**from Barbounis**

**to Roman**



Sep 17, 2018, 7:40 AM

Olivia just threw up in the car. Vasili has a walk through at 9. I'll be in when he gets back around 11:30-12

Sep 17, 2018, 8:38 PM

FYI. I'm having bad kidney pain. I went to the ER after class but left because the wait was 4.5 hours. If it doesn't get better I'm gonna plan to go to urgent care in the am. If it does get better I'll just schedule an appoint with my dr. There are 2 scenarios 1 it's a Stone (will pass and shouldn't hurt for two long and doesn't really require medical attention) 2 it's an infection that requires antibiotics. I have a history of both. I'm hoping it's 1 and I'll be better in the am. Either way it could explain the way I felt today. I'll keep you posted.

Sep 18, 2018, 8:10 AM

I'm going to urgent care and Thelma is out for plumbing issues.

**EXHIBIT 11**

**Text Messages**

**Between**

**Plaintiff and**

**Matthew**

**Bennett**

From: +16093009342 Matt Bennett

Now you see one of reasons I've disliked Eman since day like 8

**Status:** Read

**Read:** 1/31/2018 7:37:28 PM(UTC-5)

1/31/2018 7:37:22 PM(UTC-5)

From: +12159102154 Me (owner)

She a loser

**Status:** Sent

**Delivered:** 1/31/2018 7:37:33 PM(UTC-5)

1/31/2018 7:37:33 PM(UTC-5)

From: +16093009342 Matt Bennett

When I saw it I was about to message Tricia to ignore her

**Status:** Read

**Read:** 1/31/2018 7:37:45 PM(UTC-5)

1/31/2018 7:37:43 PM(UTC-5)

From: +16093009342 Matt Bennett

Meanwhile Eman is the biggest clock watcher

**Status:** Read

**Read:** 1/31/2018 7:38:04 PM(UTC-5)

1/31/2018 7:38:04 PM(UTC-5)

From: +12159102154 Me (owner)

If you feel that way message us on slack not the whole office

**Status:** Sent

**Delivered:** 1/31/2018 7:38:05 PM(UTC-5)

1/31/2018 7:38:04 PM(UTC-5)

From: +12159102154 Me (owner)

Everyone was gone and it was past 4:30

**Status:** Sent

**Delivered:** 1/31/2018 7:38:30 PM(UTC-5)

1/31/2018 7:38:29 PM(UTC-5)

From: +16093009342 Matt Bennett

DP wants her gone, so says gregg

**Status:** Read

**Read:** 1/31/2018 7:38:33 PM(UTC-5)

1/31/2018 7:38:33 PM(UTC-5)

From: +12159102154 Me (owner)

Doubt it. She is a walking lawsuit

**Status:** Sent

**Delivered:** 1/31/2018 7:38:48 PM(UTC-5)

1/31/2018 7:38:48 PM(UTC-5)

# **EXHIBIT 12**

## **Text Messages**

### **from Plaintiff to**

### **J. Reynolds**

From: +12159102154 Me (owner)

**Attachments:**



Size: 982777  
File name: IMG\_8459.HEIC  
IMG\_8459.HEIC



Size: 1503935  
File name: IMG\_8458.HEIC  
IMG\_8458.HEIC

**Status:** Sent

**Delivered:** 3/11/2018 12:10:11 PM(UTC-4)

**Read:** 6/1/2018 2:03:28 PM(UTC-4)

3/11/2018 12:09:58 PM(UTC-4)

From: +12159102154 Me (owner)

Yes. But it's all like that.

**Status:** Sent

**Delivered:** 3/11/2018 12:10:26 PM(UTC-4)

**Read:** 6/1/2018 2:03:28 PM(UTC-4)

3/11/2018 12:10:25 PM(UTC-4)

From: +12159102154 Me (owner)

My place is awesome and the French host is so hot

**Status:** Sent

**Delivered:** 3/11/2018 12:10:40 PM(UTC-4)

**Read:** 6/1/2018 2:03:28 PM(UTC-4)

3/11/2018 12:10:39 PM(UTC-4)

From: +18562871436 Jane Reynolds

Haha good

**Status:** Read

**Read:** 3/11/2018 12:11:05 PM(UTC-4)

3/11/2018 12:11:00 PM(UTC-4)

From: +12159102154 Me (owner)

**Attachments:**



Size: 990998  
File name: IMG\_8461.HEIC  
IMG\_8461.HEIC



Size: 965611  
File name: IMG\_8460.HEIC  
IMG\_8460.HEIC

**Status:** Sent

**Delivered:** 3/11/2018 12:11:16 PM(UTC-4)

**Read:** 6/1/2018 2:03:28 PM(UTC-4)

3/11/2018 12:11:10 PM(UTC-4)

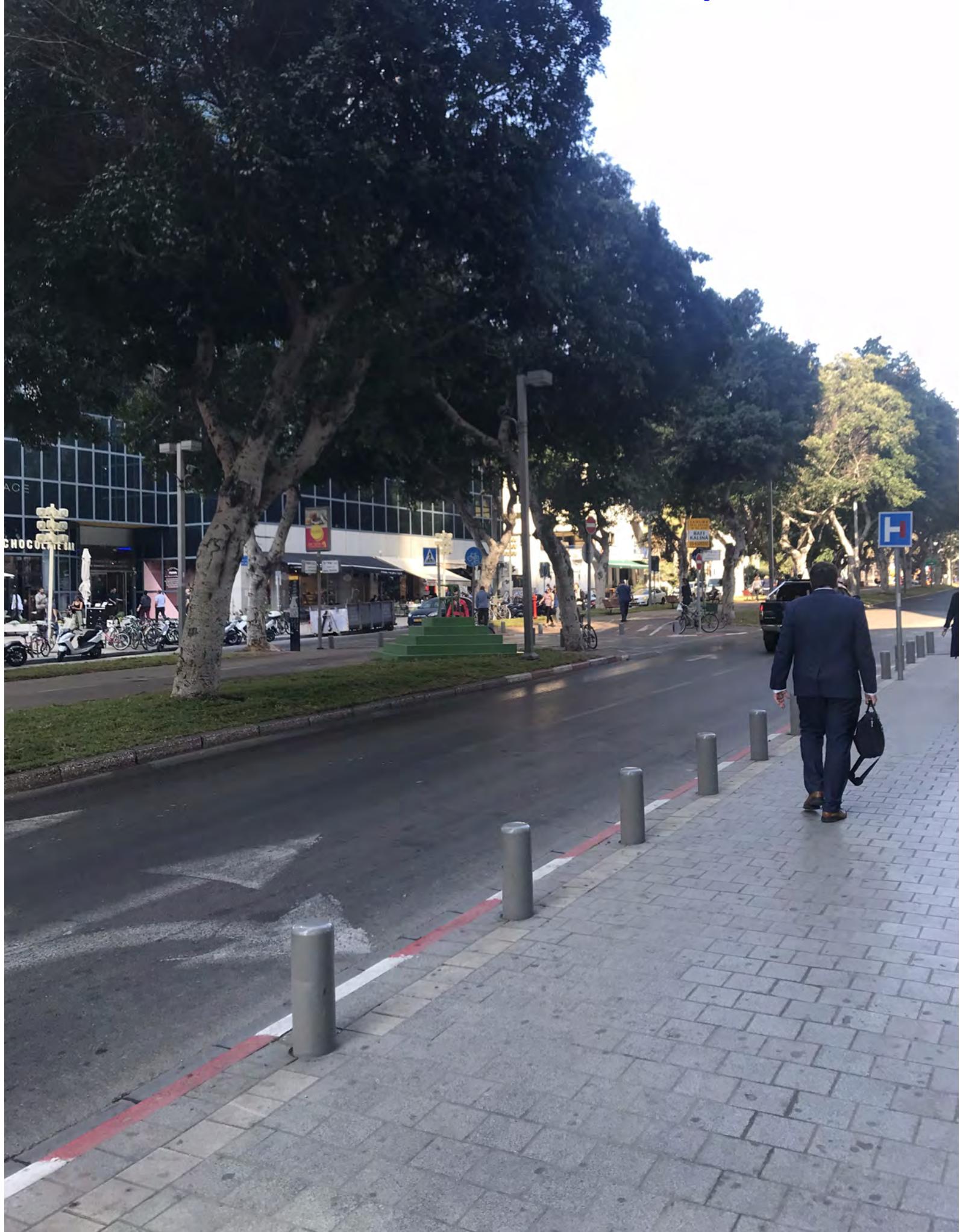
# **EXHIBIT 13**

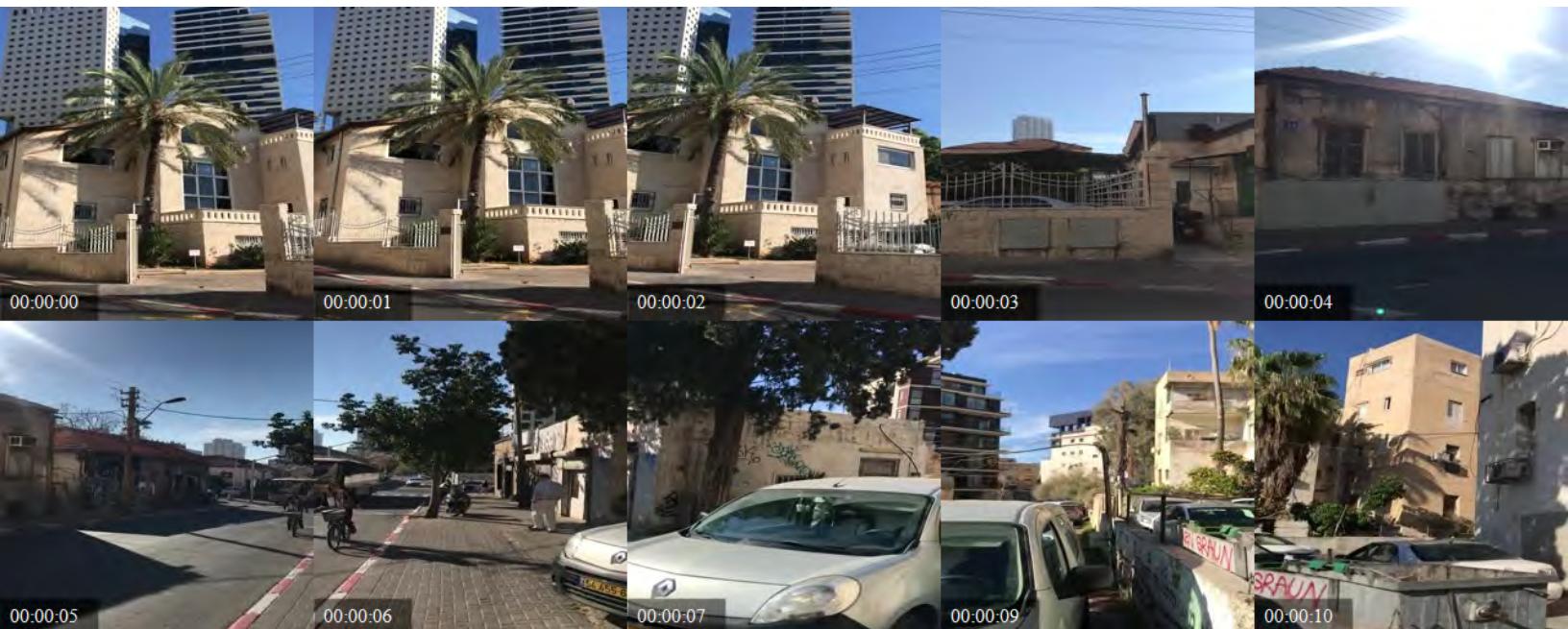
## **Photos taken by**

## **Plaintiff in Israel**























**EXHIBIT 14**  
**Intentionally**  
**Left Blank**  
**(same as**  
**Exhibit 12)**

**EXHIBIT 15**

**Affidavits of**

**Ashley Perry,**

**Gilad Ach, and**

**Matan Peleg.**

**A Deposition by Ashley Perri, ID 209721059**

This deposition was filmed and taken on 25.10.20 in Mr. Ashley Perri's house in Efrat.

Attorney Tzur Pollack took this deposition.

TP: Good Afternoon. At this moment, we will be making a deposition regarding Mr. Greg Roman and Ms. Lisa Barnos.

Q: Please tell me about how you met Mr. Roman and Ms. Barnos.

A: We'll start with Greg; I've known Greg since 2007. We worked together on a project in the Old City in Jerusalem that included explaining the conflict to English speakers. The project was through Aish Hatorah. We've worked together a couple of times since then, once when I was a consultant to the Foreign Minister we worked together on a few projects. I started working with the Middle East Forum four years ago, I think. I was the first director of "Project Victory" for a year and a half. At the time, I was also their lobby representative in the Knesset. Today I am a consultant to the Middle East Forum in Israel, and I know Greg personally. We're friends, and I like him.

I met Lisa Barnos for the first time while leading a delegation of MK's to Washington. I think it was in the winter of 2018. We had a couple of meetings in Congress, and after that I went to the office in Philadelphia and there I met Lisa (I had met her also at joint events in the office). On Friday we went shopping together and she advised me and came with me to do the shopping. I don't think we have met since. Yes, we spoke a couple of times on the phone when she worked as a media consultant because that is my background. We talked about the MEF's strategy and about conveying the information to the media.

Q: Where did your last meeting with them take place?

A: On a Friday in the winter of 2018, they were together in the office when I met with them. I was being introduced to the workers at the office with whom I mostly work by phone.

Q: What was the purpose of the meeting?

A: Getting to know the office staff better

Q: How did Lisa behave during the meeting? Was there anything strange in her behavior?

A: No, Normal behavior and also Greg.

Q: Was there anything special about the meeting's location?

A: No.

Q: Did you have any one on one conversations with Ms. Barnos?

A: Yes, on the way to shopping. We talked about her work in the US that was similar to the work I did in Israel in the past. We talked a bit about our families, a personal and professional conversation.

Q: Did you hear from her about any improper behavior she experienced? Any complaints about harassment in the workplace?

A: No.

S. Ron

צור פולק, ע"ת  
81779.7.1

Q: Did she say anything strange during the conversation, something that one could interpret as an attempt to signal distress?

A: Not that I recall.

Q: What is your connection to the Middle East Forum?

A: Today I am the MEF's consultant in Israel and in 2018 I was the director of "Project Victory".

Q: Have you heard of complaints regarding Greg?

A: I heard a bit about the complaint. In all the years that I have known Greg I never saw any strange behavior on his part. I never saw anything that could be interpreted as strange or harassing in his behavior.

Q: Is there anything you would like to add?

A: I think that's it.

I have read this disposition, this is my name, this is my signature and the content is true A. Pollack

Validation of signature

The undersigned, Tzur Pollack, confirm that on the 25/10/20, Ashley Perri came before me, and I recognized him according to his ID number 209721059. After warning him that he must speak only the truth and liable to face penalties if he does not do so, he confirmed this disposition and signed it.

ת"ז פולק, ע"ז  
81779.7.20

Translation authorized by

Mrs Shulamit Ron BA MA (Native English speaker and former instructor of English at Bar Ilan University (30 years) and Sharei Mishpat Law School (12 years))

ID 012150884

S. Ron

ת"ז רון, ע"ז  
81779.7.20

**A Desposition by Gilad Ach on 15.9.20, ID 039253026**

This deposition was filmed and taken on 15.9.20 in Mr. Gilad Ach's office.

Attorney Tzur Pollack took this deposition.

TP: Good Afternoon. At this moment, we will be making a deposition regarding Mr. Greg Roman and Ms. Lisa Barnos.

Q: Please tell me about how you met Mr. Roman and Ms. Barnos.

A: I've known Greg Roman since around 2016. I met him and Daniel Pipes in Jerusalem, we met a couple times in Israel and a couple times in the US. In General, the Middle East Forum and my organization "Ad Kan" cooperate on international projects that involve radical Islam and activities delegitimizing Jews and the state of Israel.

I met Ms. Barnos at a meeting discussing our activities and our plans, held in a Tel Aviv apartment at the start of 2018. Lisa was there for part of the meeting.

Later in Philadelphia, I don't remember an exact date, I met Lisa for a second time.

Q: Where did the meeting take place?

A: In Tel Aviv, in an Airbnb apartment that they rented for their stay in Israel, I don't remember the exact address.

Q: What was the purpose of the meeting?

A: The Middle East Forum helps us as an organization. During the meeting, I gave them updates about our activities and our plans. Greg is the CEO of the MEF. I'm the CEO of Ad Kan.

Q: How did Lisa behave during the meeting? Was there anything strange in her behavior?

A: She was completely normal. There was nothing strange about the meeting with her. She told me about her position in the MEF. If I'm not mistaken, she said she was from the research team there. I asked her how Israel is, and she said it's a lovely country.

Q: Did the meeting's location seem weird to you? Why did you choose to hold the meeting there?

A: No, there were some classified things that we were discussing. We preferred not to sit at a coffee shop.

Q: Did you have any conversations with Ms. Barnos?

A: Not really, maybe a minute or two. Just polite conversation.

Q: Did you hear from her about any improper behavior she experienced? Any complaints about harassment?

A: No, absolutely not. Lisa didn't look shaken in any way; she seemed just fine. Everything looked normal.

Q: Did she say anything strange during the conversation, something that one could interpret as an attempt to signal distress?

A: No, by the way, after checking, my visit to Philadelphia was in March 2018. I met Lisa in her office.

Q: What is your connection to the Middle East Forum?

A: As I said, the "Ad Kan" organization, which I run, works together with the Middle East Forum since 2016, and we receive annual financial aid for part of our activity and our joint programs.

Q: Have you heard of complaints regarding Greg?

A: I heard that Lisa complained that she experienced sexual assault while she was in the country. I didn't see that she was in distress. I didn't see anything that she might have been trying to signal, help, or anything of the sort. There was nothing in that direction.

Q: Is there anything you would like to add?

A: No, I saw the apartment they were in which they were staying. I saw their relationship, and it looked very cordial. Greg explained that the reason they chose the Airbnb apartment and not a hotel is that he deals with issues regarding foreign countries and that he's not interested in having his conversations overheard.

I have read this disposition, this is my name, and the content is true

Validation of signature

The undersigned, Tzur Pollack, confirm that on the 15/9/20, Gilad Ach came before me, and I recognized him according to his ID number 039253026. After warning him that he must speak only the truth and liable to face penalties if he does not do so, he confirmed this disposition and signed it.

Translation authorized by

Mrs S Ron BA MA

Native English speaker and former instructor of English at Bar Ilan University (30 years) and Shaarei Mishpat (12 years)

10 - 012 150884

S. Ron

צור פולק, עו"ד  
81779 7.1  
Tzur Pollak, LL.M.

Declaration by Matan Peleg 8/9/20 I.D. 035821123

Declaration was conducted and filmed on 8/9/20 in Mr. Matan Peleg's office.

Editor of the Declaration – Advocate Tzur Pollack

T.P. – Good morning. Right now, we are going to edit a declaration regarding Mr. Greg Roman and Ms. Lisa Barnus.

Q – Did you meet with Greg Roman and Lisa Barnus?

A – Yes.

Q – When did you meet?

A – In 2008, I think, I don't remember an exact date, and not all of my meetings are written down in my planner.

Q – Where did the meeting take place?

A – A restaurant in Tel-Aviv, I don't remember the name of the restaurant.

Q – What was the goal of the meeting?

A – Updates mostly, "Im Tirtzu," the organization I am the head of, is supported by the Middle East Forum, and in addition to the regular updating emails, when Greg comes to visit Israel, we meet to update each other and talk about important matters.

Q – How did Lisa act in the meeting? Was there anything weird in the way she was acting?

A – I admit I didn't pay much attention to Lisa, my main focus was Greg, but I can't say she was dominant in the meeting. Most of the professional conversation was between Greg and me, but there was no tension that I felt I needed to pay attention to, I don't remember anything out of the ordinary from the meeting, she presented herself to me as someone who works in The Forum, looks like a nice person, but I don't remember any unusual behavior from the meeting.

Greg is a very assertive person, he conducted the conversation authoritatively, there was good dynamics in the conversation, there wasn't anything special between Lisa and me, except for when Greg went to the bathroom/to pay the bill when Lisa and I talked insignificant small talk.

Q – Did the location of the meeting seem weird to you? Why did you guys choose to meet there specifically?

A – Doesn't seem weird to me, usually we have a meeting either in the office or in a restaurant, it's always good to sit in public locations that allow for personal conversation as well. We ate, we talked, and we finished the meeting in the restaurant.

Q – Did you speak to Ms. Branus alone, just you two other than the "small talk"?

A – No. I'm naturally a more curious and sensitive person. If I had a feeling that someone was trying to talk to me/ to "send me a message," I would speak to the person.

Q – Did you hear any complaints from her about inappropriate behavior towards her? A complaint about harassment of any kind?

A – No, I didn't hear anything like that from her. Months after the meeting, I heard rumors that there were a few complaints within the Forum, but I didn't look into the rumors, and, at the time of the meeting, I didn't know about it.

Greg is authoritative, which, in my eyes, is an essential quality for a CEO, I can understand people who are thrown off by it, and he'll always be more "senior" than you. He's not a "small talk" kind of guy, and the types of conversation he has with other people that I know and with me are very professional and sterile relationships.

Q – What is your connection to The Middle East Forum?

A – The organization "Im Tirtzu" started their relationship with the Middle East Forum before my time and before Greg's time at the organization. The Middle East Forum is an organization that I appreciate, and they financially support us. However, the support from the Middle East Forum is much less than it was in the past, and I am not dependent on The Forum and, therefore, I have no reason to distort the reality to protect someone from there.

Q – Do you know where Greg and Lisa stayed in their visit here in Israel (hotel/apartment)?

A – I assume in Tel-Aviv, I don't know where, I didn't ask, probably in an "air BnB" apartment or in a hotel.

Q – Is there anything else you can add?

A – No. Look, I'm going back to the point of Greg's personality- we're talking about a person who brings a level of professionalism to the table that might throw people off him; he's also physically a big guy, he has a powerful energy, which usually helps focus the meeting, he doesn't flirt and look for "small talk", instead gets straight to the point. That's also the reason, I think, that in Greg's time there, The Forum rose to where it's gotten now.

In a social dynamic, when there's one woman in a room of men, someone will often say a joke about the woman. Greg is not that kind of person. Greg is equally hard on everyone. That's what I can say about him.

I read the full declaration. This is my name, and the contents of the declaration are true  
Authentication of signature

I, the undersigned, Tzur Pollack, confirm that on the 8/9/20, Mr. Matan Poleg presented himself to me, I recognized him by his ID 035821123, and after I warned him to speak the truth otherwise there will be consequences of the law, he approved this declaration and signed it in front of me.

Translation authorized by:

Mrs S. Ron BA, MA

Native English speaker and former instructor of English at Bar Ilan University (30 years) and Shaarei Mishpat (12 years)

1D- 012150884      S. Ron

צור פולק, אונ"ת  
81779.7.0

**EXHIBIT 16**

**Text Messages**

**from Plaintiff to**

**M. Bennett**

From: +12159102154 Me (owner)  
I don't either but I just told her Gregg is a good person but not a Good boss  
Status: Sent  
Delivered: 3/20/2018 10:45:55 AM(UTC-4)

3/20/2018 10:45:54 AM(UTC-4)

From: +16093009342 Matt Bennett  
The first thing she'll do if she thinks you're whispering to me is tell Gregg that you ran to me  
after whatever happened

Status: Read

Read: 3/20/2018 10:45:53 AM(UTC-4)

3/20/2018 10:45:58 AM(UTC-4)

From: +16093009342 Matt Bennett  
So.....

Status: Read

Read: 3/20/2018 10:59:53 AM(UTC-4)

3/20/2018 10:59:50 AM(UTC-4)

From: +16093009342 Matt Bennett  
I didn't catch the whole convo

Status: Read

Read: 3/20/2018 11:25:45 AM(UTC-4)

3/20/2018 11:25:32 AM(UTC-4)

From: +16093009342 Matt Bennett  
What's going on now

Status: Read

Read: 3/20/2018 11:25:53 AM(UTC-4)

3/20/2018 11:25:53 AM(UTC-4)

From: +12159102154 Me (owner)  
We are all good. Great actually. My point was it's better when you talk to the person  
directly

Status: Sent

Delivered: 3/20/2018 11:26:21 AM(UTC-4)

3/20/2018 11:26:22 AM(UTC-4)

# **EXHIBIT 17**

# **Message from**

# **Plaintiff to P.**

# **McNulty**

**2018-03-29 14:41:58 UTC: +12159102154@iMessage -> [3 recipients]**

---

**From:** Home <+12159102154@imessage>  
**To:** Home <"+1 215-910-2154">, Tricia McNulty <"+1 609-742-1968">, Home <lisarey@sas.upenn.edu>  
**Date:** Thu, 29 Mar 2018 10:41:58 -0400

---

I need to look for a new job where I'm not an assistant

# **EXHIBIT 18**

# **MEF Sexual**

# **Harrassment**

# **Seminar**

**Middle East Forum**  
**All Staff Meeting**  
Tuesday April 17, 2018  
9:00 p.m. EDT

<b>9:00 AM-9:15 AM-</b>	<b>Opening Remarks</b> -Gregg Roman
<b>9:15 AM-10:00AM</b>	<b>Harassment Training</b> -Marnie Meyer
<b>10:00 AM-10:15AM</b>	<b>Personnel Manual Updates/ Life Insurance Beneficiary Forms</b> -Marnie Meyer
<b>10:15AM AM-5:00PM</b>	<b>Roundtable discussions</b>
<b>10:15-11:00AM</b>	<b>IVP-5-minute overview of 2018 objectives</b> -EJ Kimball <b>Brainstorming session</b> -All
<b>11:00-11:45PM</b>	<b>Washington Project-5-minute overview of 2018 objectives</b> -Cliff Smith <b>Brainstorming session</b> -All
<b>11:45-1PM</b>	<b>Lunch</b>
<b>1:00-1:45PM</b>	<b>Legal Project-5-minute overview of 2018 objectives</b> -Marc Fink <b>Brainstorming session</b> -All
<b>1:45-2:30</b>	<b>MEQ-5-minute overview of 2018 objectives</b> -Judy Goodrobb <b>Brainstorming session</b> -All
<b>2:30-3:15</b>	<b>Campus Watch-5-minute overview of 2018 objectives</b> -Winfield Myers <b>Brainstorming session</b> -All
<b>3:15 -4:00</b>	<b>Islamist Watch-5-minute overview of 2018 objectives</b> -Sam Westrop <b>Brainstorming session</b> -All
<b>4:00-4:45PM</b>	<b>Fundraising-5-minute overview of 2018 objectives</b> -Sam Westrop <b>Brainstorming session</b> -All
<b>4:45-5:00PM</b>	<b>Closing Remarks</b> -Gregg Roman

**EXHIBIT 19**

**Message from**

**Plaintiff to**

**Roman**

Noooooooooooo

03/20/2018 11:10:51

I deserve a break every once in a while too 😊

03/20/2018 11:11:08

I heard you were upset about the email not going out. I was too.

03/20/2018 11:11:17

What email?

03/20/2018 11:11:22

You should feel comfortable telling me when you are upset

03/20/2018 11:11:31

The one about the executive committee

03/20/2018 11:11:40

To the PDs.

03/20/2018 11:12:32

You said send it out to those in the meeting and i didn't think the next step through to the action items of the PDs. My bad.

03/20/2018 11:12:44

And you have other things your doing that I need you to focus on

03/20/2018 11:13:14

There will be a time to speak about that mistake, but now is not it.

03/20/2018 11:13:20

Ok. I'm focused but I want you to know you should feel comfortable telling me when I piss you off

03/20/2018 11:13:53

But there's a time and place

03/20/2018 11:14:11

And when your working on somethin  
g worth millions of \$\$\$

03/20/2018 11:14:16

That's not the time or place

03/20/2018 11:14:46

Ok. I'm just saying it because I'm sur  
e there will be another time that I do



Hold on. Baby back up

03/21/2018 00:15:37

I can't align the agenda to the docs. 1  
. Marnie has page numbers on the do  
cs and I can't change them 2. Some  
of the pages on her docs are blank a  
nd I can't eliminate them

03/21/2018 00:16:37

For example. Schedule 1 projected r  
evenue has 6 pages but 5 of them ar  
e blank

03/21/2018 00:18:21

Schedule one should be labeled pag  
e 4

03/21/2018 00:19:08

I'm still going to label and send back t  
o you

03/21/2018 01:24:24

Can you read what I sent

03/21/2018 01:26:31

Wake up!!!

Working our asses off

03/21/2018 18:49:37



03-21-2018 18\_4

9\_37.mp4

03/21/2018 18:49:37

This is my life right now

03/21/2018 19:02:07

Tell me about it

03/21/2018 19:44:42

Feeling pretty good about tomorrow  
with website and excomm

03/21/2018 19:44:51

We've had one hell of a week

03/21/2018 19:45:30

I know. But is all worth it. I'm excited  
about the website

# **EXHIBIT 20**

## **Text Messages**

### **between Plaintiff**

### **and P. McNulty**

From: +12159102154 Me (owner)

I just called Gregg in Israel and told him I'm at a breaking point and I'm about to quit

**Status:** Sent

**Delivered:** 5/12/2018 7:57:55 AM(UTC-4)

5/12/2018 7:57:50 AM(UTC-4)

From: +16097421968 Tricia McNulty

Oh shit. What did he say???

**Status:** Read

**Read:** 5/12/2018 10:17:42 AM(UTC-4)

5/12/2018 9:49:11 AM(UTC-4)

From: +12159102154 Me (owner)

Can you talk. I just got off the phone

**Status:** Sent

**Delivered:** 5/12/2018 10:17:52 AM(UTC-4)

5/12/2018 10:17:52 AM(UTC-4)

From: +16097421968 Tricia McNulty

Yeah

**Status:** Read

**Read:** 5/12/2018 10:18:00 AM(UTC-4)

5/12/2018 10:17:59 AM(UTC-4)

From: +12159102154 Me (owner)

I told him tired of morning inserting herself and everybody's job including mine

**Status:** Sent

**Delivered:** 5/12/2018 10:18:03 AM(UTC-4)

5/12/2018 10:18:03 AM(UTC-4)

From: +16097421968 Tricia McNulty

I bought the wrong one

**Attachments:**



Size: 145410

File name: 54784176856\_58098C52-062E-4BDB-8290-B31B874E25DF.jpeg  
54784176856\_58098C52-062E-4BDB-8290-B31B874E25DF.jpeg

**Status:** Read

**Read:** 5/12/2018 2:17:13 PM(UTC-4)

5/12/2018 2:16:50 PM(UTC-4)

From: +12159102154 Me (owner)

Lol

**Status:** Sent

**Delivered:** 5/12/2018 2:17:24 PM(UTC-4)

5/12/2018 2:17:24 PM(UTC-4)